

Affirmative Marketing: TDHCA Guidance

Presented by:

Texas Department of Housing and Community Affairs



DISCLAIMER

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Any opinion, findings, conclusions, or recommendations expressed in this material are those of the author(s) and do not necessarily reflect the views of the U.S. Department of Housing and Urban Development.



Before We Start

- All materials and recordings of this webinar will be available on the TDHCA website.
- If you have any questions, please enter them into the question chat box – after every segment, we will answer the questions in the chat box.
- This training is informational only and does not satisfy the requirements in 10 TAC §10.402(e)(1)-(2) for post bond closing documentation (for Multifamily Bond transactions) and documentation submitted for the 10 Percent Test (for Housing Tax Credits).



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Fair Housing Act

Affirmative Marketing Overview

Affirmative Marketing Plan Requirements

How to Develop an Affirmative Marketing Plan

Procedures for Implementing an Affirmative Marketing Plan

Agenda



Learning Objectives

Understand

Understand Affirmative Marketing and Fair Housing

Develop

Know how to Develop an Affirmative Marketing Plan

Implement

Know how to Implement an Affirmative Marketing Plan





Federal and Texas Fair Housing Acts

The Fair Housing Act

- It is the policy of the United States to provide, within constitutional limitations, for fair housing through the United States. No person shall be subjected to discrimination because of their race, color, religion, sex, handicap (disability), familial status, or national origin in the sale, rental, or advertising of dwellings, in the provision of brokerage services or in the availability of real estate-related transactions. (24 CFR §100.5(a))
- Section 808(e)(5) of the Fair Housing Act is to affirmatively further the purposes of the Fair Housing Act, which includes ensuring positive outreach and informational efforts to those who are least likely to know about and apply for housing

The Texas Fair Housing Act

The Texas Fair Housing Act mirrors the text of the Federal Fair Housing Act

- Passed by the Texas Legislature on May 25, 1989
- The Texas Commission on Human Rights, established June 26, 1983 by the state legislature, originally enforced the Texas Fair Housing Act
- Since September 1st, 2015, the duties of the Texas Commission on Human Rights were transferred to the Civil Rights Division of the Texas Workforce Commission.





Affirmative Marketing Overview

Affirmative fair housing marketing and outreach is a requirement per statute, executive order and regulation. Statutory authority exists in the:

Fair Housing Act

Section 504 of the Rehabilitation Act of 1973

Title VI of the Civil Rights Act

Also, Executive Order 11063 provides that all Federal executive departments and agencies must act to end discriminatory practices for properties receiving federal financial assistance.

Affirmative
Fair Housing
Marketing
Plan
Authorities



Affirmative Fair Housing Marketing - Policy

- All applicants for participation in Federal Housing Agency (FHA) subsidized and unsubsidized multifamily housing programs with five or more units (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.

Affirmative Fair Housing Marketing Requirements for HOME, NHTF, and NSP

- All applicants for participation in rental and homebuyer projects containing
 - Five or more HOME-assisted housing units (24 CFR §92.351); or
 - Five or more NHTF-assisted housing units (24 CFR 93.350)

must complete the Affirmative Marketing procedures and requirements as specified in 24 CFR §200.625

HUD Requirements

- a) Carry out an affirmative program to attract buyers or tenants, regardless of sex, disability or familial status, of all minority and majority groups to the housing for initial sale or rental.
- b) Maintain a nondiscriminatory hiring policy in recruiting from both minority and majority groups, including both sexes and the disabled, for staff engaged in the sale or rental of properties.
- c) Instruct all employees and agents in writing and orally in the policy of nondiscrimination and fair housing.



HUD Requirements: Continued

- d) Specifically solicit eligible buyers or tenants reported to the applicant by the Area or Insuring Office.
- e) Prominently display in all offices in which sale or rental activity pertaining to the project or subdivision takes place the Department-approved Fair Housing Poster and include in any printed material used in connection with sales or rentals, the Department-approved Equal Housing Opportunity logo or slogan or statement.
- f) Post in a conspicuous position on all FHA project sites a sign displaying prominently either the Department-approved Equal Housing Opportunity logo or slogan or statement.





TDHCA Requirements

Per 10 TAC §20.9(2)d

- An Administrator receiving Federal funds must have an Affirmative Fair Housing Marketing Plan (AFHMP). The AFHMP must be submitted to the Department each time the Administrator applies for a new contract or a new type of activity, and reflect marketing activities specific to the activity type. The Administrator may submit a previously approved AFHMP if no changes need to be made. The plan must be submitted at a **minimum of every three years** if the Administrator continues to accept new applications.

Single Family Requirements



HUD Form 935-2B

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

U.S. Department of Housing and Urban Development
Office of Fair Housing and Equal Opportunity

OMB Approval No. 2529-0013
(exp. 1/31/2021)

1a. Applicant's Name, Address (including City, State & Zip code) & Phone Number	1c. Development Number	1d. Number of Units
	1e. Price Range From \$ To \$	1f. Type of Housing <input type="checkbox"/> Development <input type="checkbox"/> Scattered Site
	1g. Approximate Starting Dates (mm/dd/yyyy) Advertising	
	Occupancy	
1b. Development's Name, Location (including City, State and Zip code)	1h. Housing Market Area	1i. Census Tract
	1j. Sales Agent's Name & Address (including City, State and Zip Code)	
2. Type of Affirmative Marketing Area (check all that apply) White (non-minority) Area		3. Direction of Marketing Activity (Indicate which group(s) in the housing market area are least likely to apply for the housing because of its location and other factors without special outreach efforts) <input type="checkbox"/> White <input type="checkbox"/> American Indian or Alaskan Native <input type="checkbox"/> Asian



Per 10 TAC §§10.617 and 10.801

- All Developments with five or more total units are required to further the objectives of Title VII of the Civil Rights Act of 1968 and Executive Order 13166 and develop and carry out an Affirmative Marketing Plan.
- An Owner must update its Affirmative Marketing Plan and populations that are least likely to apply **every five years from the effective date** of the current plan.

Multifamily Requirements



HUD Form 935.2A

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. 12/31/2016)

1a. Project Name & Address (including City, County, State & Zip Code)	1b. Project Contract Number	1c. No. of Units
	1d. Census Tract	
1e. Housing/Expanded Housing Market Area		
Housing Market Area: Expanded Housing Market Area:		
1f. Managing Agent Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address		
1g. Application/Owner/Developer Name, Address (including City, County, State & Zip Code), Telephone Number & Email Address		





Help for Texans

Dev

Communities & Nonprofits



- Asset Management
- Bond Finance
- Closing Status Database
- Compliance
- Fair Housing
- Financial Administration
- Housing Resource Center
- Human Resources
- Information Systems
- Internal Audit
- Loan Servicing
- Migrant Labor Housing

- Main
- Housing Contract System
- Online Reporting
- Manuals and Rules
- Forms
- Reports
- Training
- Utility Allowances
- Income and Rent Limits

Single Family Affirmative Marketing Tool

- [Single Family Affirmative Marketing Tool](#)
- [TDHCA form, Single Family Affirmative Marketing Plan for HOME and NSP \(DOC\)](#)
- [TDHCA form, Single Family Affirmative Marketing Plan for Colonias \(DOCX\)](#)
- [HUD 935.2B Affirmative Marketing Form \(Current Version - PDF\)](#)
- [Single Family Affirmative Marketing Technical Assistance Guide \(PDF\)](#)
- [Source document, Single Family Affirmative Marketing Tool \(PDF\)](#)
- [Language Access Plan, Guidance and Example Plan \(DOC\)](#)

Affirmative Marketing Plans

- [HUD 935.2A Affirmative Marketing Form \(Previous Version - PDF\)](#)
- [HUD 935.2A Affirmative Marketing Form \(Current Version - PDF\)](#)

• <https://www.tdhca.state.tx.us/pmcomp/forms.htm>

Forms on TDHCA Site





How to Determine “Least Likely to Apply Populations”

Service Area Demographic Data

- For Single Family Programs, this will be the service area covered in your TDHCA contract.
- For Multifamily Properties, this will be your covered service area, which might look different depending on where your property is located in Texas.

Property Demographic Data

- Established properties, or properties that are not currently in lease up, should have basic demographic data about the tenants living on the property.
 - This should include race, sex, if there are children under 18 in the household, and whether the occupants are Hispanic.
- Ideally, you will want to use this data along with the American Community Survey to determine your least likely to apply populations.

American Community Survey

When determining least likely to apply populations, the American Community Survey (ACS), which is like the decennial Census, except that it is conducted every year, is the best data source to compare your property's demographics against.

Can be found at <https://data.census.gov/cedsci/>

Search for "dp05"

This is the name of the ACS data table that will have demographic data for you to compare with

Explore Census Data

The Census Bureau is the leading source of quality data about the nation's people and economy.

<input type="text" value="dp05"/>	<input type="button" value="SEARCH"/>
DP05: ACS DEMOGRAPHIC AND HOUSING ESTIMATES	
Advanced Search	



ACS DEMOGRAPHIC AND HOUSING ESTIMATES

Survey/Program: American Community Survey TableID: DP05 Product:

Notes Selections Geos Years Topics Surveys Codes 123

	United States
Label	
SEX AND AGE	
Total population	328,

2019: ACS 1-Year Estimates Data Profiles

2019: ACS 5-Year Estimates Data Profiles

2018: ACS 1-Year Estimates Data Profiles

2018: ACS 5-Year Estimates Data Profiles

2017: ACS 1-Year Estimates Data Profiles

2017: ACS 5-Year Estimates Data Profiles

2016: ACS 1-Year Estimates Data Profiles

Map

American Community Survey, Cont'd

Determine your market area. This is usually going to be either the county that your property is in or the Metropolitan Statistical Area (MSA). The market area is basically the area from which most of your applicants will come.

IMPORTANT NOTE: Before you do anything else with the ACS table DP05, make sure you change the product to the most recent *5-year estimates data profile*

American Community Survey, Cont'd

Change the ACS Demographics and Housing Estimates Table (Table DP05) to the correct geography. Select either "County" or "Metropolitan Statistical Area/Micropolitan Statistical Area" and follow the prompts to find your county or MSA

ACS DEMOGRAPHIC AND HOUSING ESTIMATES

Survey/Program: American Community Survey TableID: DP05 Product: 2019: ACS 5-Year Estimates Dat

Notes Selections **Geos** Years Topics Surveys Codes 123 Hide Transpose Filter Margin of Error

GEOGRAPHY

Show Summary Levels

Corporation

American Indian Area/Alaska Native Area/Hawaiian Home Land

Metropolitan Statistical Area/Micropolitan Statistical Area

Combined Statistical Area

New England City and Town Area

Urban Area

houston

- Houston-The Woodlands-Sugar Land, TX Metro Area
- Houston-Sugar Land-Baytown, TX Metro Area
- Houston-Sugar Land-Baytown, TX Metro Area -- In metropolitan or

// Search / Tables / DP05

ACS DEMOGRAPHIC AND HOUSING ESTIMATES

Survey/Program: American Community Survey TableID: DP05 Product: 2019: ACS 5-Year Estimates Data Profiles

Notes Selections **Geos** Years Topics Surveys Codes 123 Hide Transpose Restore Export Download Filter Margin of Error

GEOGRAPHY

Show Summary Levels

Nation

Region

Division

State

County

Tract

texas

harris

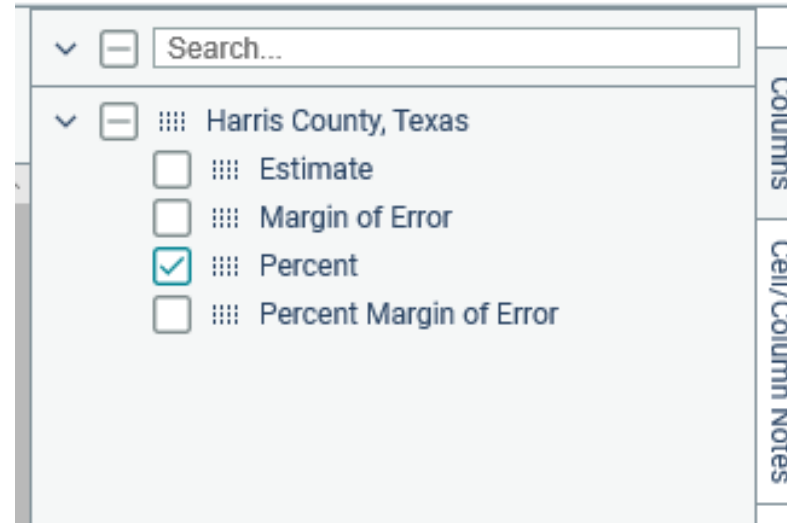
- Texas
- Harris County, Texa
- Harrison County, Te
- Harris County, Texa farm
- Harris County, Texa
- Harrison County, Te

Selected Geographies:



American Community Survey, Cont'd

- Once you have selected your geography, you're almost done!
- Click the "Hide" button and de-select everything except "Percent"



- Once you have done that, you can now copy the demographic data into your worksheet (the HUD 935.2A worksheet in Appendix A is super helpful for this) and compare your property demographics to the demographics of your market area.
- Make sure to save the property and market area data to submit with your Affirmative Marketing Plan

What if I don't have property demographics?

- It's possible that you won't. Your property may be in lease-up or you may have just inherited your property from a different owner who did not keep this data or took it with them.
- You will need to use data from your census tract instead. To find out what your property's census tract is, you can use either of these tools:
 - <https://geocoding.geo.census.gov/geocoder/geographies/address?form>
 - <https://geomap.ffiec.gov/FFIECGeocMap/GeocodeMap1.aspx>
- The second tool includes a link to some of the necessary demographic data, but it does not have data on households with children

The screenshot shows the FFIEC Geocoding Map interface. At the top, the 'Year' is set to 2020 and the 'Address' is 302 Crosstimbers St, Houston Tx 77022. Below this is a table of 'Matched Address' data:

Matched Address	
Address	302 CROSSTIMBERS ST, HOUSTON, TX, 77022
MSA/MD Code	26420
State Code	48
County Code	201
Tract Code	5304.00
MSA/MD Name	HOUSTON-THE WOODLANDS-SUGAR LAND, TX
State Name	TEXAS
County Name	HARRIS COUNTY

To the right of the table is a map showing the location of the address. A red dot marks the address location. A 'Census Demographic Data' button is visible on the map. The map shows streets such as Cottage Oak Ln, Golf Dr, Pinemont Dr, and Sue Marie Ln. A census tract boundary is highlighted in yellow, with the tract code 5308.00 visible.

What if I don't have property demographics, cont'd

- Using the American Community Survey, just like you did with your market area, select table DP05 for your census tract.
- Remember to select the most recent **5-year estimates data profile** under "Product."

// Search / Tables / DP05

ACS DEMOGRAPHIC AND HOUSING ESTIMATES

Survey/Program: American Community Survey TableID: DP05 Product: 2019: ACS 5-Year Estimates Data Profiles

Notes Selections 1 Geo Years 2 Topics Surveys Codes 123 Hide Transpose Margin of Error Restore Export Download More Data Map

GEOGRAPHY
 Show Summary Levels

Nation
Region
Division
State
County
Tract

WITHIN (STATE)

Texas
Utah
Vermont
Virginia
Washington
West Virginia
Wisconsin

WITHIN (COUNTY)

5304

Harris County, Texas
Hamilton County, Texas
Hansford County, Texas
Hardeman County, Texas
Hardin County, Texas
Harris County, Texas
Harrison County, Texas
Haskell County, Texas

Census Tract 5304, Harris County, Texas

Selected Geographies: Census Tract 5304, Harris County, Tex...
Geography

Single Family Programs

HUD Form 935-2B: Sections 2 & 3

2. **Type of Affirmative Marketing Area** (check all that apply)

White (non-minority) Area

Minority Area

Mixed Area (with _____ % minority residents)

3. **Direction of Marketing Activity** (Indicate which group(s) in the housing market area are **least** likely to apply for the housing because of its location and other factors without special outreach efforts)

White American Indian or Alaskan Native Asian

Black or African American Native Hawaiian or Other Pacific Islander

Hispanic or Latino Persons with Disabilities Families with Children

Other _____ Specify _____
(e.g. specific ethnic group, religion, etc.)



Households with Children

- You must include Households with Children in your analysis if:
 - You are participating in a TDHCA-monitored Single Family program
 - A TDHCA-monitored Multifamily Property
 - Exception: if you qualify as a Housing for Older Persons Act AND you do not have any HUD funding that requires you to accept households with children
- To find the ACS data on Households with Children, follow the same steps outlined the in previous slides for the ACS table S1101

// Search / Tables / S1101

HOUSEHOLDS AND FAMILIES
 Survey/Program: American Community Survey TableID: S1101 Product: 2019: ACS 5-Year Estimates Subject Tables

Notes Selections 1 Geo Years Topics Surveys Codes 123 Hide Transpose Margin of Error Restore Excel Download More Data Map

GEOGRAPHY
 Show Summary Levels

010 - United States
 020 - Region
 030 - Division
 040 - State
 050 - County
 060 - County Subdivision

tex Harris County, Texas
 Harrison County, Texas

Search Within Harris County, T

Census Tract 5304, Harris County, Texas
 Census Tract 5305, Harris County, Texas
 Census Tract 5306, Harris County, Texas
 Census Tract 5307, Harris County, Texas

Selected Geographies: Census Tract 5304, Harris County, Texas

SELECTED HOUSEHOLDS BY TYPE

Households with one or more people under 18 years	36.1%	±8.5	50.7%	±17.2	81.9%	±19.4
Households with one or more people 60 years and over	41.0%	±8.2	46.4%	±17.2	19.3%	±19.9



Multifamily Properties

HUD Form 935-2A: Section 3a-b, Worksheet 1

3a. Demographics of Project and Housing Market Area

Complete and submit Worksheet 1.

3b. Targeted Marketing Activity

Based on your completed Worksheet 1, indicate which demographic group(s) in the housing market area is/are *least* likely to apply for the housing without special outreach efforts. (check all that apply)

- White
 American Indian or Alaska Native
 Asian
 Black or African American
 Native Hawaiian or Other Pacific Islander
 Hispanic or Latino
 Persons with Disabilities
 Families with Children
 Other ethnic group, religion, etc. (specify)

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.**

Demographic Characteristics	Project's Residents	Project's Applicant Data	Census Tract	Housing Market Area	Expanded Housing Market Area
% White					
% Black or African					





Community Contacts

Contact Examples

People with Disabilities

- Local Centers for Independent Living (CIL)
- Aging and Disability Resource Center (ADRC)
- Local Mental Health Authority (LMHA)
- Local Non-profits in your area serving individuals with disabilities
- 211

Black/African American

- Black Chamber of Commerce
- Local NAACP (National Association for the Advancement of Colored People) Chapter
- Historically Black Churches/Places of Worship
- Local Black Newspaper/Radio Stations/Media Outlets



Single Family Programs

HUD Form 935-2B: Section 4C

4c. Marketing Program: Community Contacts. To further inform the group(s) least likely to apply about the availability of the housing, the applicant agrees to establish and maintain contact with the groups/organizations listed below which are located in the housing market area. If more space is needed, attach an additional sheet. Notify HUD-Housing of any changes in this list. Attach a copy of correspondence to be mailed to these groups/organizations. (Provide all requested information.)

Name of Group/Organization	Group Identification	Approximate Date (mm/dd/yyyy)	Person Contacted (or to be Contacted)
Address & Phone Number	Method of Contact		Indicate the specific function the Group/Organization will undertake in implementing the marketing program



Multifamily Properties

HUD Form 935-2A: Section 4B, Worksheet 3

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.

Previous editions are obsolete

Page 2 of 8

Form HUD-935.2A (12/2011)

Worksheet 3: Proposed Marketing Activities –Community Contacts (See AFHMP, Block 4b)

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.
------------------------	---



Elderly Developments

- Elderly Developments that meet the Housing for Older Persons Act definition and are not required by regulation, use agreement, or zoning to house households with children are not required to affirmatively market based on familial status. This group is not a least likely to apply population.
- However, **Elderly Developments that must accept otherwise qualified households with children** (which are most developments funded by HUD or USDA) **need to analyze whether this protected class is least likely to apply.**



Veterans and Other Populations

- Some LURAs require additional marketing to specific populations, such as veterans or farmworkers. This is a TDHCA requirement but not an affirmative marketing requirement, and outreach to these populations does not satisfy the community contacts for affirmative marketing purposes.



What if I can't find contacts for a population?

- If you can't find any contacts for your least likely to apply populations, document those reasons within your Affirmative Marketing Plan. These reasons must be provided with supporting evidence of your efforts.

What if I Can't Find Contacts: An Example (Part 1)

- Aside from the types of groups already mentioned, you may want to look at where the people in your community work.
- Example: Slaton, TX has a population of 3,000 and is in Lubbock County, TDHCA Region 1. The Single Family Affirmative Marketing Tool indicates that "Asian" is a least likely to apply population for your activity:

Activity: Rehabilitation

- HOME Contract for Deed
- HOME Homeowner Rehabilitation Assistance

Least Likely to Apply Populations:

Race: Asian

Ethnicity: None

Other Groups: Persons with Disabilities, Households with Children

- Slaton has a very small Asian population, so there are just no community contacts serving that group.



What if I Can't Find Contacts: An Example (Part 2)

- Where does your community work?
 - OnTheMap – a Census Bureau tool that can help you figure this out!
 - <https://onthemap.ces.census.gov/>
 - Search for your city/town/county and click "Perform Analysis"
 - Use the settings below to figure out where the people in your area work (Use the most recent year)

Analysis Settings

Destination Analysis in 2018 by All Jobs

Home/Work Area	Analysis Type	Year	Job Type
Determines whether the selection area is analyzed on where workers live ("Home") or where workers are employed ("Work"). <input checked="" type="radio"/> Home <input type="radio"/> Work	Determines the type of results that will be generated for the selected area. <input type="radio"/> Area Profile Labor Market Segment: All Workers <input type="radio"/> Area Comparison Areas to Compare: Places (Cities, CDPs, etc.) Labor Market Segment: All Workers <input type="radio"/> Distance/Direction <input checked="" type="radio"/> Destination Destination Type: Places (Cities, CDPs, etc.) <input type="radio"/> Inflow/Outflow Note: Home/Work choice does not affect results	Determines the year(s) of data that will be processed in the analysis. <input checked="" type="checkbox"/> 2018 <input type="checkbox"/> 2017 <input type="checkbox"/> 2016 <input type="checkbox"/> 2015 <input type="checkbox"/> 2014 <input type="checkbox"/> 2013 <input type="checkbox"/> 2012 <input type="checkbox"/> 2011 <input type="checkbox"/> 2010 <input type="checkbox"/> 2009 <input type="checkbox"/> 2008 <input type="checkbox"/> 2007 <input type="checkbox"/> 2006 <input type="checkbox"/> 2005 <input type="checkbox"/> 2004	Determines the scope of jobs that will be processed in the analysis. <input checked="" type="radio"/> All Jobs <input type="radio"/> Primary Jobs <input type="radio"/> All Private Jobs <input type="radio"/> Private Primary Jobs

Cancel Go!

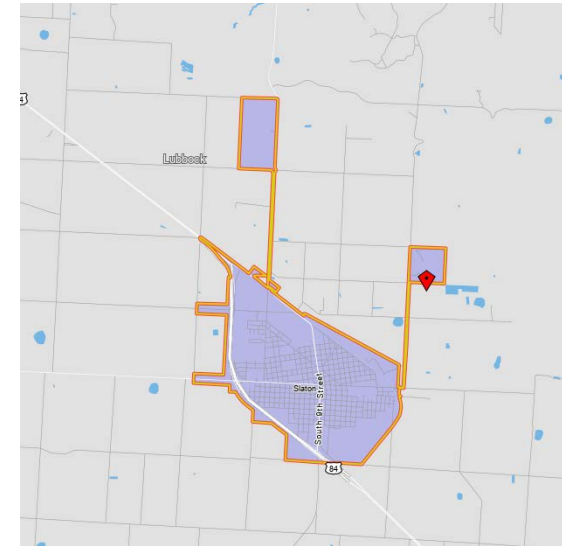
What if I Can't Find Contacts: An Example (Part 3)

Only 11% of the people living in Slaton also work in Slaton.

53% of the people living in Slaton work in Lubbock.

Lubbock Asian grocers, Asian chambers of commerce, and other groups serving a primarily Asian clientele would be possible contacts in Lubbock.

Not all towns will have such an obvious answer, but document taking steps like these so you have evidence that you looked for contacts.



**Jobs Counts by Places (Cities, CDPs, etc.)
Where Workers are Employed - All Jobs**

	2018	
	Count	Share
All Places (Cities, CDPs, etc.)	2,657	100.0%
Lubbock city, TX	1,405	52.9%
Slaton city, TX	294	11.1%
Post city, TX	59	2.2%
Amarillo city, TX	41	1.5%
Dallas city, TX	38	1.4%
Levelland city, TX	36	1.4%
Midland city, TX	36	1.4%
Houston city, TX	28	1.1%
Odessa city, TX	21	0.8%



Media Outlets

Single Family Programs

HUD Form 935-2B: Section 4a

4a. Marketing Program: Commercial Media (Check the type of media to be used to advertise the availability of this housing)

Newspapers/Publications Radio TV Billboards Other (specify)

Name of Newspaper, Radio or TV Station	Group Identification of Readers/Audience	Size/Duration of Advertising



Multifamily Properties

HUD Form 935-2A: Section 4C, Worksheet 4

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.

Previous editions are obsolete

Page 2 of 8

Form HUD-935.2A (12/2011)

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)			





Procedures for Implementing Plan

Marketing and Outreach

Per 10 TAC §10.801(d)(1) - Multifamily

- (1) the plan must include special outreach efforts to the "least likely to apply" populations through specific media, organizations, or community contacts that work with least likely to apply populations or work in areas where least likely to apply populations live. The outreach efforts identified in the Affirmative Marketing Plan must be performed by the Development at least once per calendar year.

Per 10 TAC §20.9(d)(2)(B) – Single Family

- (B) An Administrator that currently has an existing list of Applicants and are not accepting new Applicants or establishing a waitlist are not required to affirmatively market until preparing to accept new Applications, but must develop a plan.

Fair Housing Logo





Affirmative marketing efforts for each of the identified populations least likely to apply must begin at least six months prior to the anticipated date the first building is to be available for occupancy for Multifamily properties.

For Single Family programs, marketing efforts must occur for every new contract, or new type of activity.



Affirmative Marketing Plans and populations that are least likely to apply **every five (5) years for Multifamily** properties and every **three (3) years for Single Family** programs from the effective date of the current plan

Timeframes and Recordkeeping

Affirmative Marketing Exception

If your waitlist is closed, Affirmative Marketing is not required. Affirmative Marketing is required as long as the Owner or Administrator is accepting applications, has an open waitlist, or is marketing prior to placement in service.

Training

- TDHCA Certified Trainers provide fair housing trainings on fair housing issues, like Affirmative Marketing.
- <http://www.tdhca.state.tx.us/fair-housing/training.htm>



TRAINING & TECHNICAL ASSISTANCE

Contact the Texas Department of Housing and Community Affairs

at

(512) 475-0306

Fair.Housing@tdhca.state.tx.us

FHEOI@tdhca.state.tx.us





Questions?



Thanks for your
Participation!