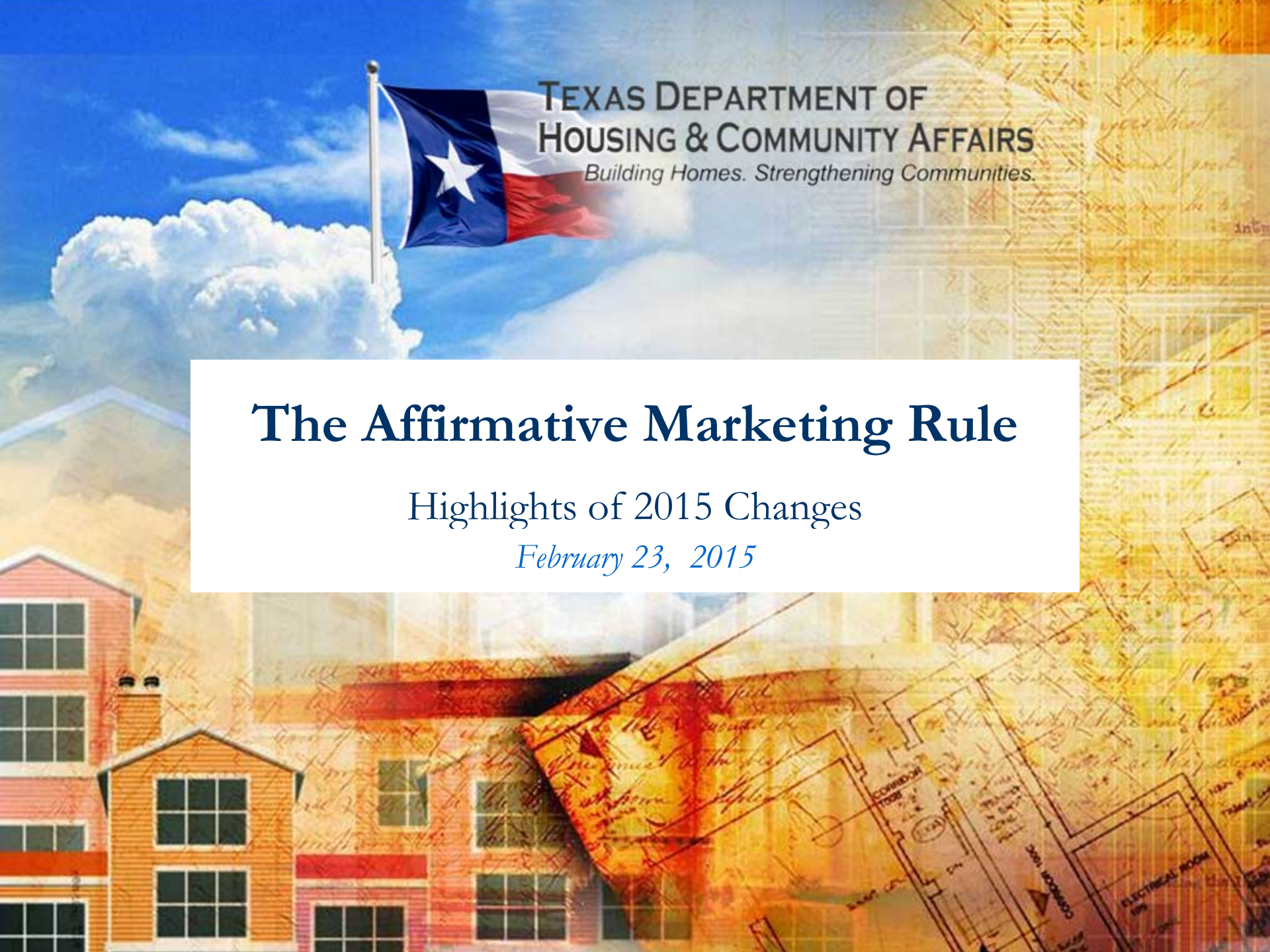


The Affirmative Marketing Rule

Highlights of 2015 Changes

February 23, 2015

Self Test: How Much Do you Know?

- True or False: The New Rule is effective April 1, 2015.
- True or False: The New Rule requires use of the newest version of the 935.2A form.
- True or False: The New Rule uses Zip Codes to determine the market area for persons least likely to apply.
- True or False: The New Rule provides different methods for determining "least likely to apply" populations in developments beginning lease up, with less than 40 units, and those which may have insufficient tenant data.
- True or False: The New Rule requires Owners to translate all of their marketing materials.

Welcome and Training Overview

Introduction

- Laura DeBellas, Fair Housing Team Lead
- Stephanie Naquin, Director of Multifamily Compliance

Welcome and Training Overview

- First Session: Affirmative Marketing
  - The basics of Affirmative Marketing
  - Highlights of the new rule and a preview of the AFHM Tool
  - How monitoring will be affected
  - Q&A session

Affirmative Marketing Basics

- HUD's guiding regulations:
  - FHA and non-FHA multifamily properties: 24 CFR 200.600 Subpart M, including 200.610, 200.615, 200.620, 200.625
  - FHA Insured properties: 24 CFR 203.12
  - HOME properties: 24 CFR 92.351, 24 CFR 92.504
  - Federally assisted properties: 24 CFR Part 5, 24 CFR Part 108
  - General guidance: The Fair Housing Act, HUD Memo 11063, 935.2A, HUD Affirmative Marketing FHEO Memos (most recently September 22, 2014), HUD's 8025.1 Rev-2

Affirmative Marketing Basics

- The Basics of Affirmative Marketing:
  - Housing opportunities should be advertised and offered to all persons, regardless of race, color, religion, sex, disability, familial status, or national origin.

EQUAL HOUSING OPPORTUNITY

=

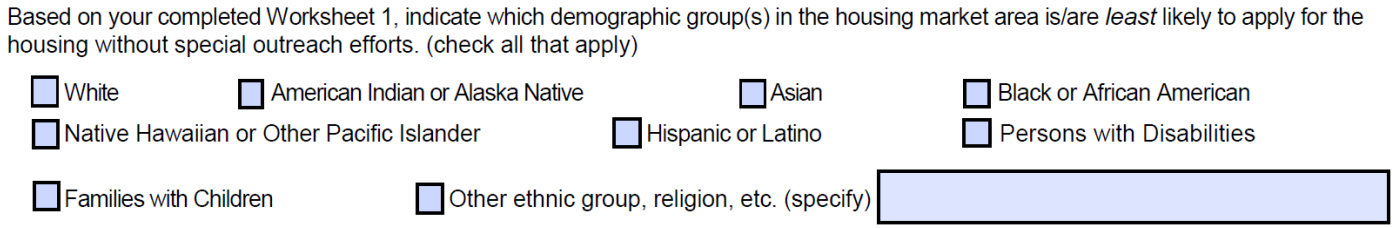
Affirmative Marketing Basics

- Structure of the Rule:
  - (a) – (c): Applicability and plan format
  - (d)(1) – (5): Tool methodology
  - (e): Other "least likely to apply" groups
  - (f)(1) – (5): Marketing and Outreach
  - (g)(1) – (2): Timeframes
  - (h)(1) – (2): Biennial plan review
  - (i): Recordkeeping requirements
  - (j): Exceptions to Affirmative Marketing

§10.617(a) – (c)

- (a) *Effective April 1, 2015,* compliance is required for all Developments with five (5) or more total units to further the objectives of Title VIII of the Civil Rights Act of 1968 and Executive Order 13166.

- (b) ….Must develop and carry out an Affirmative Fair Housing Marketing Plan to provide for marketing strategies and documentation of outreach efforts to prospective applicants identified as "least likely to apply".
  - Must provide for affirmative marketing to persons with disabilities
  - May be required to market to veterans or other special populations
  - General definition of "least likely to apply" groups:


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)

§10.617(a) – (c)

- (c) Owners are encouraged to use *any version of the 935.2A*
  - Owners participating in HUD funded programs *must use the version required by the program* (HOME, PRA 811, Section 8, etc.)

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:

§10.617 (d)(1) – (5)

- (d)(1) – (5) – Department tool methodology
  - Defines how "least likely to apply" groups will be determined
    - 20% threshold for comparison if population is ≥1%
  - Defines the housing market area
    - MSA if in an MSA, County if not in an MSA
  - Sets two types of comparative criteria
    - One for Established Developments
      - Compares Tenant Pool Data to MSA or County
    - One for New Developments (in initial lease up or not occupied)
      - Compares Census Tract to MSA or County
        (Why? No Tenant Data)

§10.617 (d)(1) – (5)

- (d)(1) – (5) – Department tool methodology
  - Exceptions for Established Developments (Compare Census Tracts to MSA or County)
    - Developments with less than 40 units
    - Developments with insufficient or inaccurate tenant data
      - Examples:
        - Large percentage of household demographic information largely collected as "N/A" in relation to the number of development units
        - Developments affected by unforeseen circumstances (disaster, high vacancy rates, etc.)

Examples

- An Owner's tenant pool shows that 5% of the residents in a development are African American and census data shows that 8% of the population in the MSA are African American.

Should African Americans be designated as a group "least likely to apply" under the rule?

(8 x 20% = 1.6%; 8% - 1.6% = 6.4%)

Yes. 5% is less than 6.4% - African Americans are underrepresented if the development data shows that

Examples

- County data shows 70% of the population in the County is Hispanic; the new development's census tract shows that 52% of the new development's census tract is Hispanic.

Should Hispanics be designated as a group "least likely to apply" under the rule?

(70 x 20% = 16%; 70% - 16% = 56%)

Yes. 52% is less than 56%. Hispanics are underrepresented by more than 20% when compared to the County as a whole.

The Department's Tool

- Information Systems (IS) has released the online tool for testing.

In the tool, you will enter:

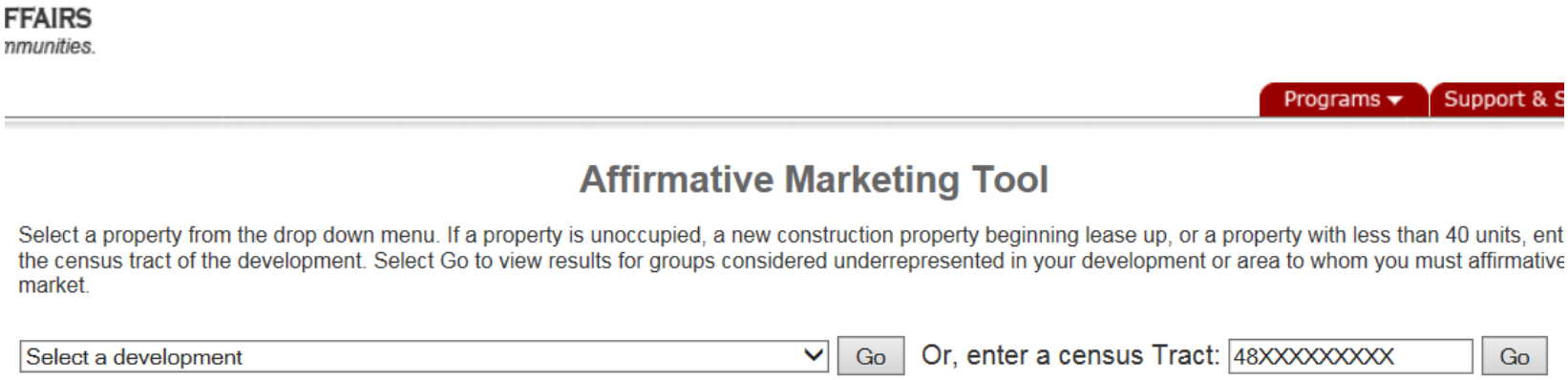
- Your Development's name or, for New Development properties and exceptions, the census tract number

Your "least likely to apply" result will auto-populate for you.

A Quick look at the AFHM Tool

http://www.tdhca.state.tx.us/pmcomp/forms.htm

A Quick look at the AFHM Tool



Existing Developments

- New Developments
- Unoccupied
- Less than 40 units
- Insufficient data

A Quick look at the AFHM Tool

Affirmative Marketing Tool

02/09/2015

Select a property from the drop down menu. If a property is unoccupied, a new construction property beginning lease up, or a
the census tract of the development. Select Go to view results for groups considered underrepresented in your development
market.

[redacted] Go Or, enter a census Tract

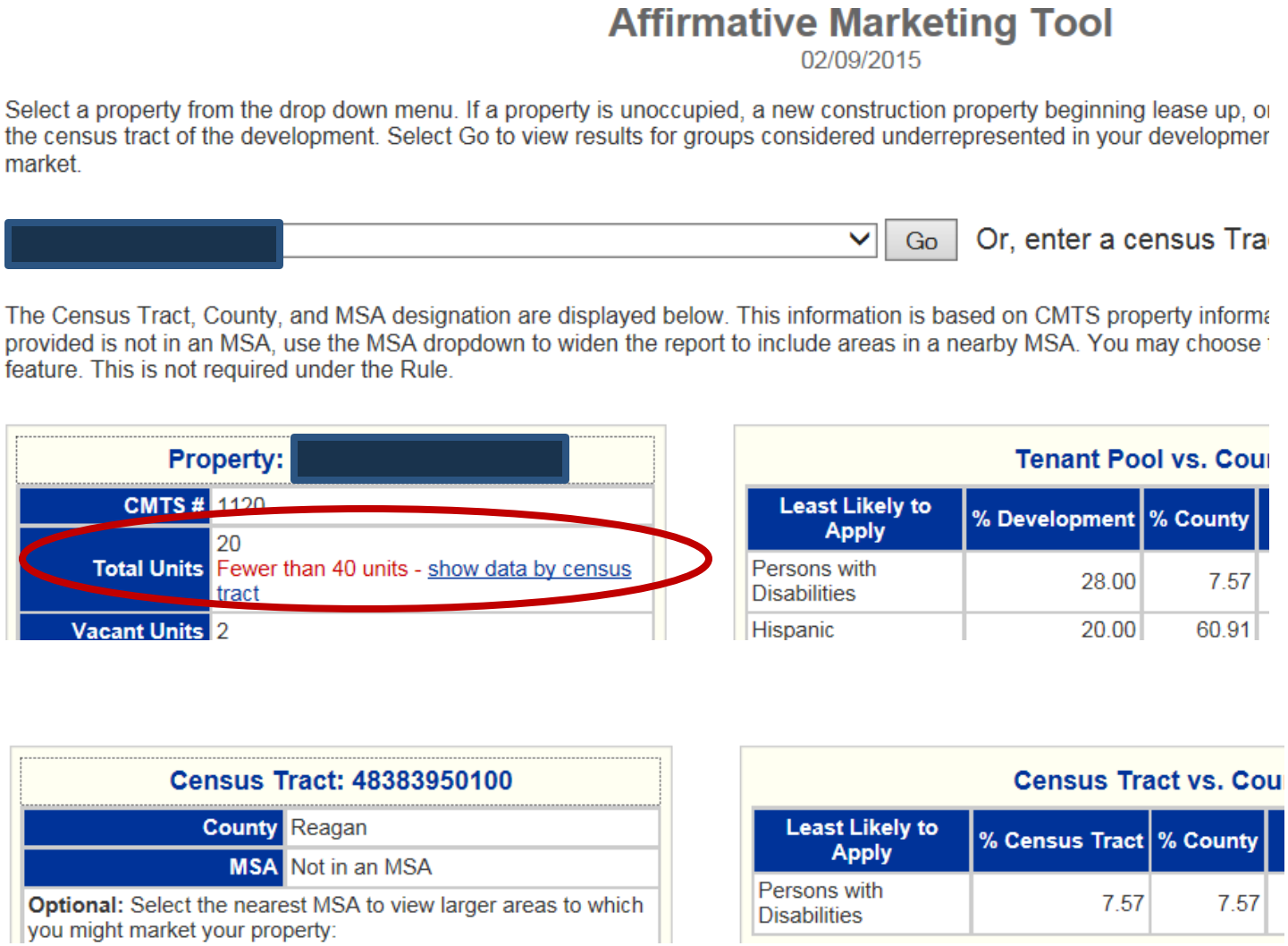
The Census Tract, County, and MSA designation are displayed below. This information is based on CMTS property informati
provided is not in an MSA, use the MSA dropdown to widen the report to include areas in a nearby MSA. You may choose to
feature. This is not required under the Rule.

Property: [redacted]	
CMTS #	1500
Total Units	197
Vacant Units	13
Date Updated	12/17/2014
Census Tract	48201510200
County	HARRIS
MSA	Houston-The Woodlands-Sugar Land, TX

Tenant Pool vs. MSA

Least Likely to Apply	% Development	% MSA	
Persons with Disabilities	0.49	9.32	
Black / African American	13.73	17.28	
Hispanic	14.71	35.41	
Asian	0.49	6.57	

A Quick look at the AFHM Tool



Affirmative Marketing Tool

02/09/2015

Select a property from the drop down menu. If a property is unoccupied, a new construction property beginning lease up, o
the census tract of the development. Select Go to view results for groups considered underrepresented in your developmer
market.

[redacted] Go Or, enter a census Tra

The Census Tract, County, and MSA designation are displayed below. This information is based on CMTS property informa
provided is not in an MSA, use the MSA dropdown to widen the report to include areas in a nearby MSA. You may choose
feature. This is not required under the Rule.

Property: [redacted]	
CMTS #	1120
Total Units	20 Fewer than 40 units - show data by census tract
Vacant Units	2

Tenant Pool vs. Cou

Least Likely to Apply	% Development	% County
Persons with Disabilities	28.00	7.57
Hispanic	20.00	60.91

Census Tract: 48383950100	
County	Reagan
MSA	Not in an MSA

Optional: Select the nearest MSA to view larger areas to which you might market your property:

Census Tract vs. Cou

Least Likely to Apply	% Census Tract	% County
Persons with Disabilities	7.57	7.57

A Quick look at the AFHM Tool

Affirmative Marketing Tool

02/09/2015

Select a property from the drop down menu. If a property is unoccupied, a new construction property beginning lease up, the census tract of the development. Select Go to view results for groups considered underrepresented in your developm market.

Select a development | Go | Or, enter a census Tr

The Census Tract, County, and MSA designation are displayed below. This information is based on CMTS property infor provided is not in an MSA, use the MSA dropdown to widen the report to include areas in a nearby MSA. You may choos feature. This is not required under the Rule.

Census Tract: 48201211300

County	Harris
MSA	Houston-The Woodlands-Sugar Land, TX

As a reminder, persons with disabilities will always appear in your results and must always be included in your affirmative marketing. Results will not display for any populations representing less than 1% of the total population of the County or MSA. These populations

Census Tract vs. M

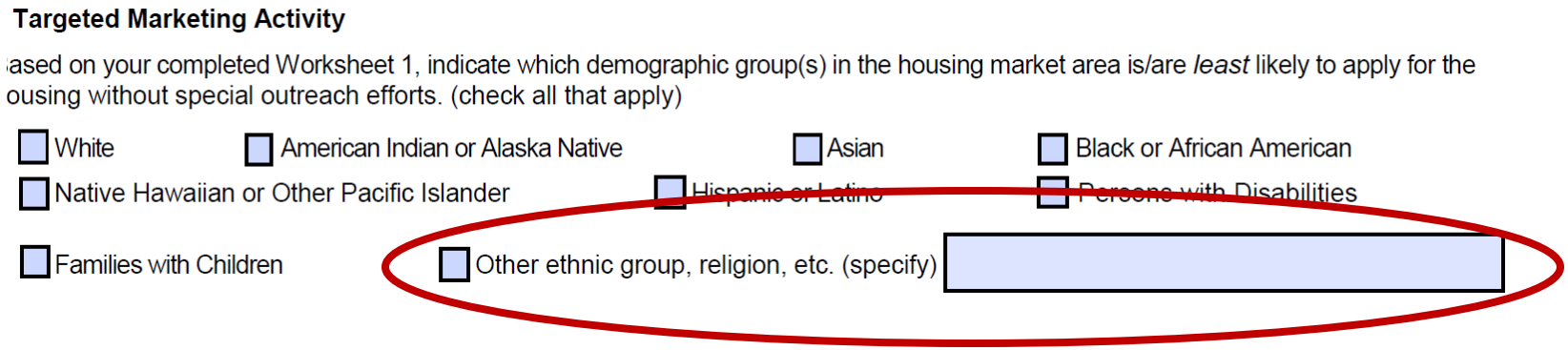
Least Likely to Apply	% Census Tract	% MSA
Persons with Disabilities	25.88	9.32
White	17.06	60.12
Hispanic	27.76	35.41
Asian	0.00	6.57

How these changes affect monitoring:

- Compliance will look for:
  - Evidence that the least likely to apply populations on the AFHMP have been analyzed as shown in the rule (you are encouraged to attach your results page to your AFHMP)
  - Evidence that the proper methodology was used:
    - By size (over 40 units?)
    - Available data (no reason to assume data is erroneous or insufficient?)
    - By type (new construction or unoccupied?)
  - Evidence that families with children have been considered (as appropriate)

§10.617(e)

- Other Groups:
  - (e) Other determinations of "least likely to apply". If the owner identifies other ethnic and/or religious groups that may be underrepresented and chooses to incorporate such group(s) into the Affirmative Marketing Plan, the Owner must perform and document a reasonable process by which the groups were identified.



§10.617 (f)(1) – (5)

(f) Marketing and Outreach

- (f)(1) The plan must include special outreach efforts to the "least likely to apply" populations through specific media, organizations, or community contacts…
- (f)(2) Developments must utilize methods of outreach throughout the MSA or, where subdivided into a Metropolitan Division, such Division or county…
- (f)(3) Developments must consider how Limited English Proficiency may affect populations least likely to apply, including ways it plans to mitigate language barriers related to advertising and community outreach.
- (f)(4) Development Owners must allow applicants to submit applications via mail or at the Development site or leasing office…
- (f)(5) Marketing must include the FH logo, give contact info for reasonable accommodations, and provide English/Spanish contact info.

§10.617 (f)(1) – (5)

(f) Marketing and Outreach

- (f)(1) The plan must include special outreach efforts to the "least likely to apply" populations through specific media, organizations, or community contacts…

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.**
	Textfield2

§10.617 (f)(1) – (5)

(f) Marketing and Outreach

- (f)(1) The plan must include special outreach efforts to the "least likely to apply" populations through specific media, organizations, or community contacts…

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)	Targeted_Population		
Radio Station(s)			
TV Station(s)			

§10.617 (f)(1) – (5)

(f) Marketing and Outreach

- (f)(2) Developments must utilize methods of outreach throughout the MSA or, where subdivided into a Metropolitan Division, such Division or county. Efforts can be made beyond these areas at the discretion of the Owner. *While these areas may be very large, in many instances outreach in areas located in another county or across town are necessary to effectively reach the identified population.*

You can:

- Use the mapping feature in the Tool to help you think about how/where to market and outreach to "least likely to apply groups"
- Use the Excel file made available by the Department to review other areas you might consider including in marketing and outreach & to help you consider families

§10.617 (f)(1) – (5)

(f) Marketing and Outreach

- (f)(3) Developments must consider how Limited English proficiency may affect populations least likely to apply, including ways it plans to mitigate language barriers related to advertising and community outreach. *Such information should be included in the Affirmative Marketing Plan as an additional consideration or as an attachment to the plan.*

You can:

- Use American FactFinder to generate results using the American Community Survey (5 year data has the lowest margin of error)
- Use the Excel file made available by the Department to review whether "least likely to apply" groups

§10.617 (f)(1) – (5)

(f) Marketing and Outreach

- (f)(4) Development Owners must allow applicants to submit applications via mail or at the Development site or leasing office; if the Development is electronically equipped, the Development may also allow applications to be submitted via email, website form, or fax.

  - *Applications can be deferred pending receipt of an application fee.*
  - *Applications must state available alternate means of submission and include address, email, or other necessary contact information on the form or its attached leasing criteria.*
  - *If the Development chooses to use an electronic application, prior approval from the Department is required.*

§10.617 (f)(1) – (5)

Online Application

Fill out the form below or download applications here:

Download Application

Download International Application

If you prefer not to submit an online application, download an application from the link above and...

mail to: Valencia Apartments [redacted]

(OR) Fax to [redacted]. Email: [redacted]

Social Security numbers and Dates of Birth may be omitted and called in during business hours at [redacted] *(9AM - 5PM Weekdays).*

The application approval process begins when we have received the completed Application and the non-refundable Application Fee of $20. The submission of the Application and the Application Fee does not guarantee your assignment to an Apartment Home. You will receive a confirmation once you have been assigned an Apartment Home or if your application is placed on the waitlist. Please note that assignments are made on a first come first serve basis.

I have read and understand the Rental Application Acknowledgement stated above. By signing this application, you declare that all your statements in this application are true and complete.

Applicant Full Name (Printed) Applicant Signature Date

Representative Signature Date

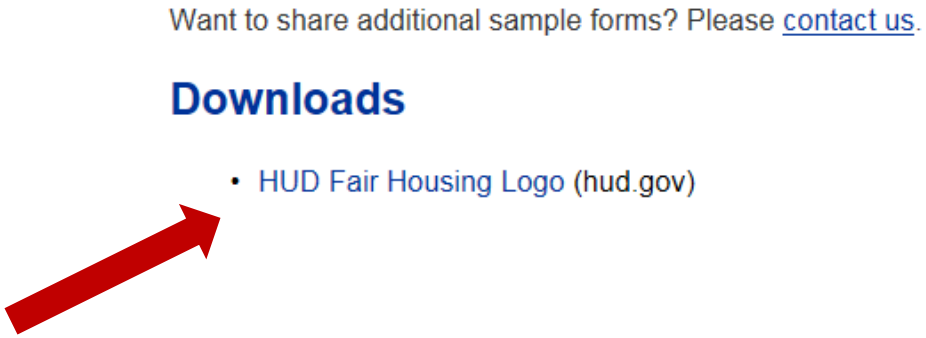
Applications can be returned in person at 1005 W. Smith Bastrop, TX 78619 during office hours of M-F from 9-5 or Saturdays from 1-4. Applications can also be mailed to: Contracted Management, Inc. at P.O. Box 395 Bastrop, TX 78619. Applications will be processed once the application fee has been paid for all prospective residents over the age of 18.

§10.617 (f)(1) – (5)

(f) Marketing and Outreach

- (f)(5) Advertisements and/or marketing materials used must include the Fair Housing logo and give contact information that prospective tenants can access if reasonable accommodations are needed in order to complete the application process. The contact information must be in English or Spanish, at a minimum.

  - You can access the FH Logo on the FH page: http://www.tdhca.state.tx.us/fair-housing/downloads.htm



§10.617 (f)(1) – (5)

Individuals with a disability wishing to request a reasonable accommodation to complete the application process should contact the Apartment Manager at (512) 999-9999.

Personas que hablan español y requieren un intérprete, favor llamar a (Name of Manager) al siguiente número (512) 999-9999.

Para solicitar un apartamento favor llamar a (Name of Manager) al siguiente número (512) 999-9999. Para solicitar una adaptación o modificación razonable, favor llamar (Name of RA Contact) al siguiente número (512) 999-9940.

EQUAL HOUSING OPPORTUNITY

§10.617 (f)(1) – (5)

Step 1 – Run the TDHCA AFHM Tool:

Affirmative Marketing Tool

02/11/2015

Select a property from the drop down menu. If a property is unoccupied, a new construction property beginning lease up, or a property with fewer than 40 the census tract of the development. Select Go to view results for groups considered underrepresented in your development or area to whom you must afl market.

[redacted] Go Or, enter a census Tract: 48XXXXXXXXX

The Census Tract, County, and MSA designation are displayed below. This information is based on CMTS property information. If the property or census t provided is not in an MSA, use the MSA dropdown to widen the report to include areas in a nearby MSA. You may choose to widen your marketing area b feature. This is not required under the Rule.

Property: [redacted]	
CMTS #	1500
Total Units	197
Vacant Units	13
Date Updated	12/17/2014
Census Tract	48201510200
County	HARRIS
MSA	Houston-The Woodlands-Sugar Land, TX

Tenant Pool vs. MSA

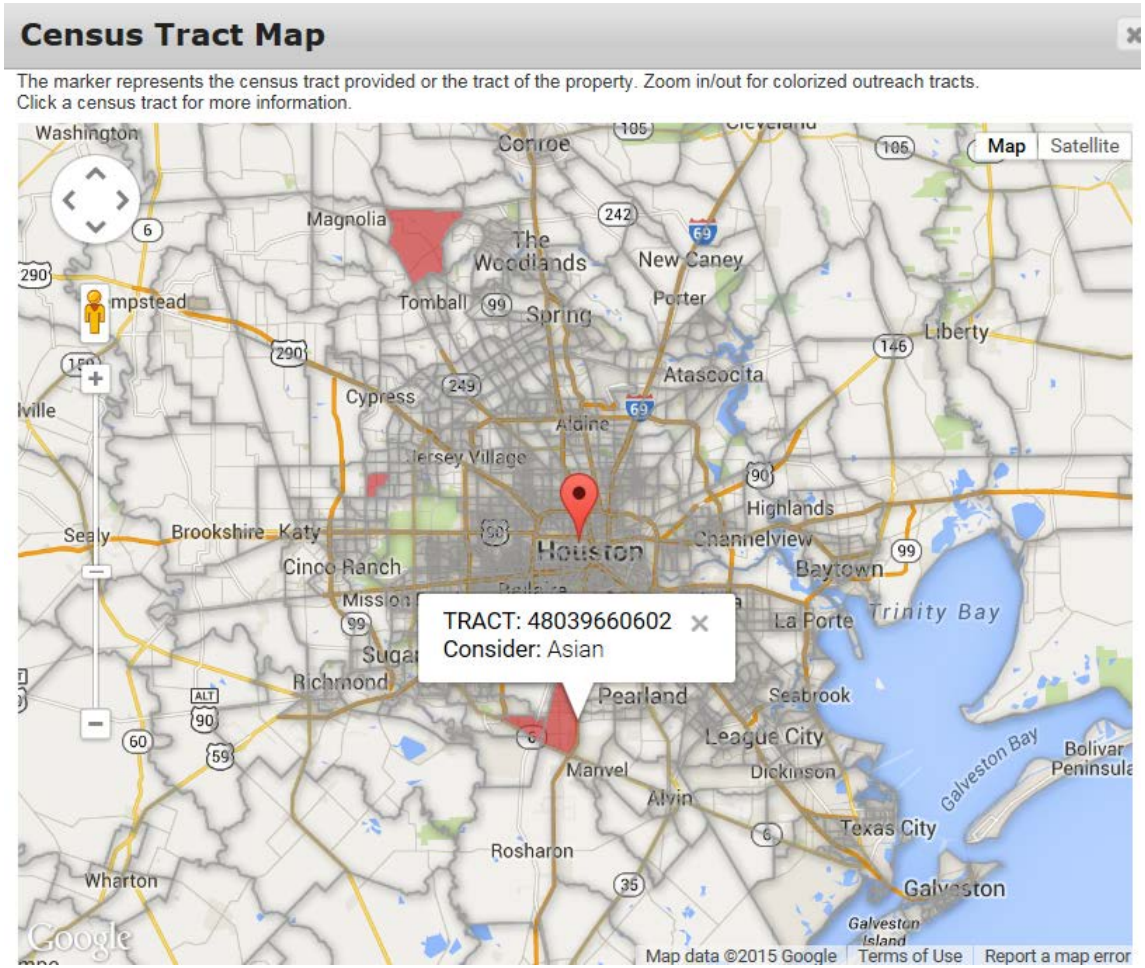
Least Likely to Apply	% Development	% MSA	Tract for Outreach Consideration
Persons with Disabilities	0.49	9.32	48339690402
Black / African American	13.73	17.28	48157670800
Hispanic	14.71	35.41	48201542101
Asian	0.49	6.57	48039660602

Map Census Tracts

§10.617 (f)(1) – (5)

EXAMPLE

Step 2 - Look at Suggested Outreach and Marketing Areas



§10.617 (f)(1) – (5)

http://www.tdhca.state.tx.us/pmcomp/forms.htm

- Compliance
- TDHCA Housing Contract System
- Online Reporting
- Manuals & Rules: Housing Tax Credits
- Forms
- Reports
- Training
- Utility Allowances
- Income and Rent Limits
- Disaster Relief / Casualty Loss
- Inspections
- FAQs
- Contact List
- Related Websites
- TDHCA Email List

Free file viewers
(To view [illegible] PDF, DOC, XLS, [illegible] files)

Compliance Forms

Single Audit

- Audit Certification Form (PDF)
- Audit Requirements and Checklist (PDF)

Program Forms

- 2014 Uniform Previous Participation Form (XLS)
- For HOME Program forms visit the HOME Division Forms page

Income Eligibility Forms for all Housing Programs

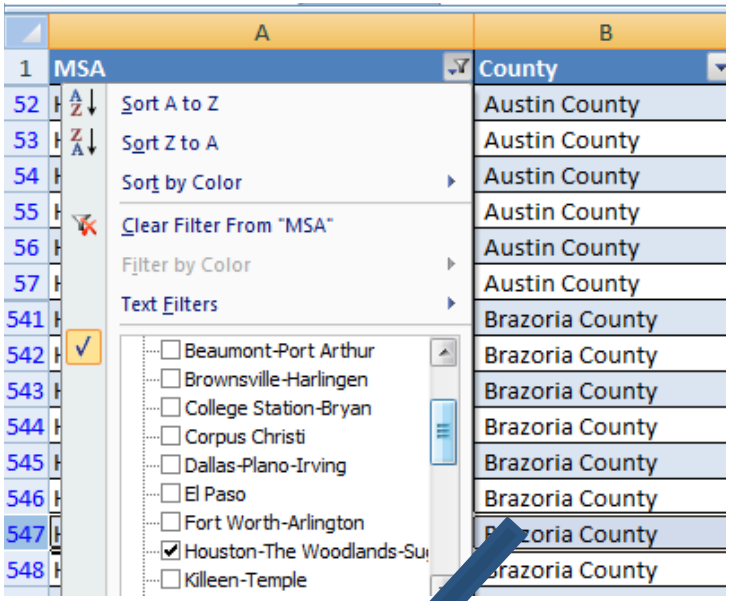
- Intake Application (PDF) or (DOC)
- Intake Supplement for Subsidy Calculation (PDF) or (DOC)
- Asset Verification (PDF) or (DOC)
- Asset Certification - Under $5,000 (PDF) or (DOC) (for HTC Only)
- Certification of Zero Income (PDF) or (DOC)
- Documentation of Telephone Verification (PDF) or (DOC)
- Employment Verification (PDF) or (DOC)
- Income Verification for Households with Section 8 Certificates (PDF) or (DOC)
- Release and Consent (PDF) or (DOC)

Compliance Forms for Multifamily Properties

Affirmative Marketing Tools

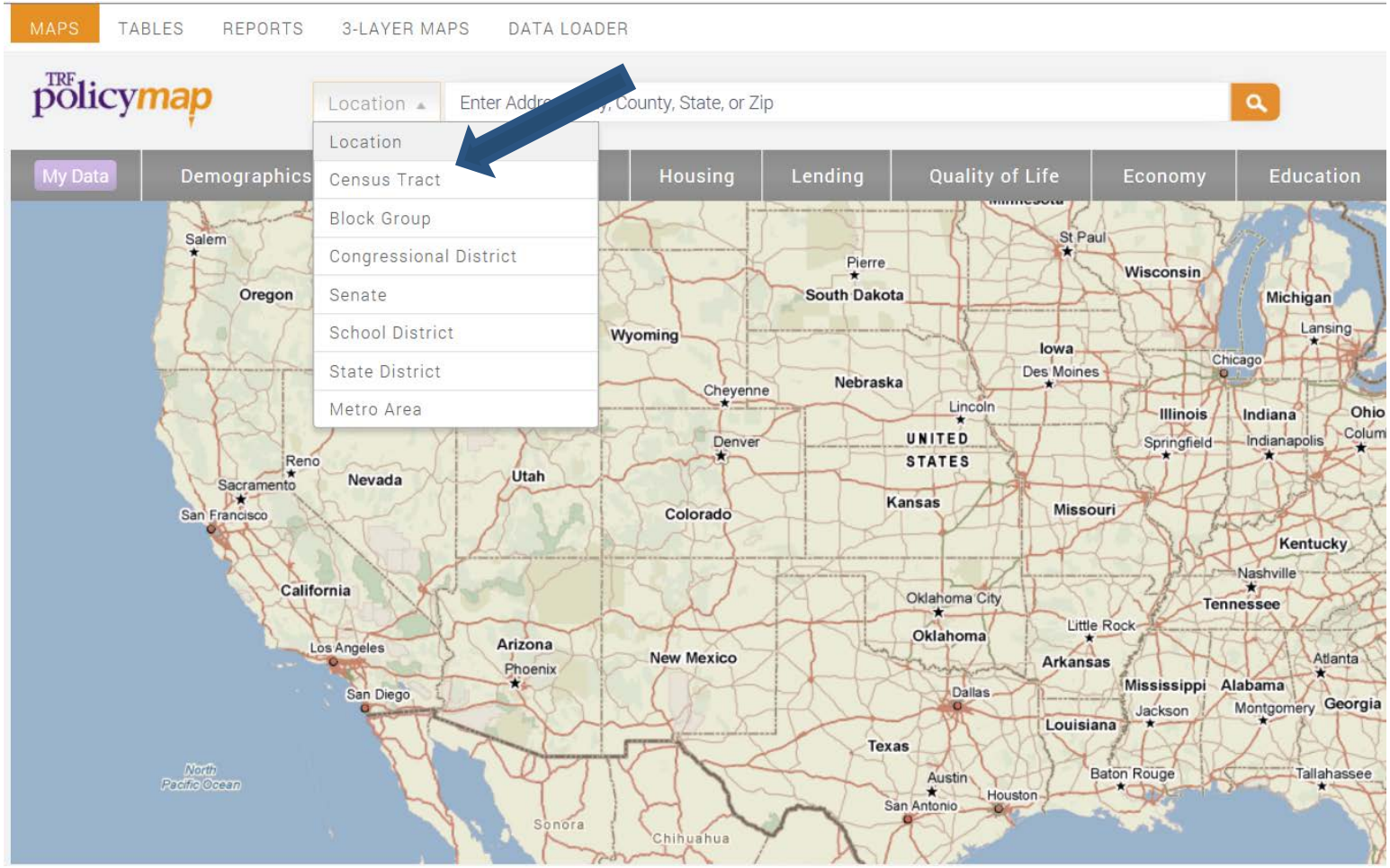
- Affirmative Marketing Web Tool
- Outreach Census Data (XLS)

§10.617 (f)(1) – (5)

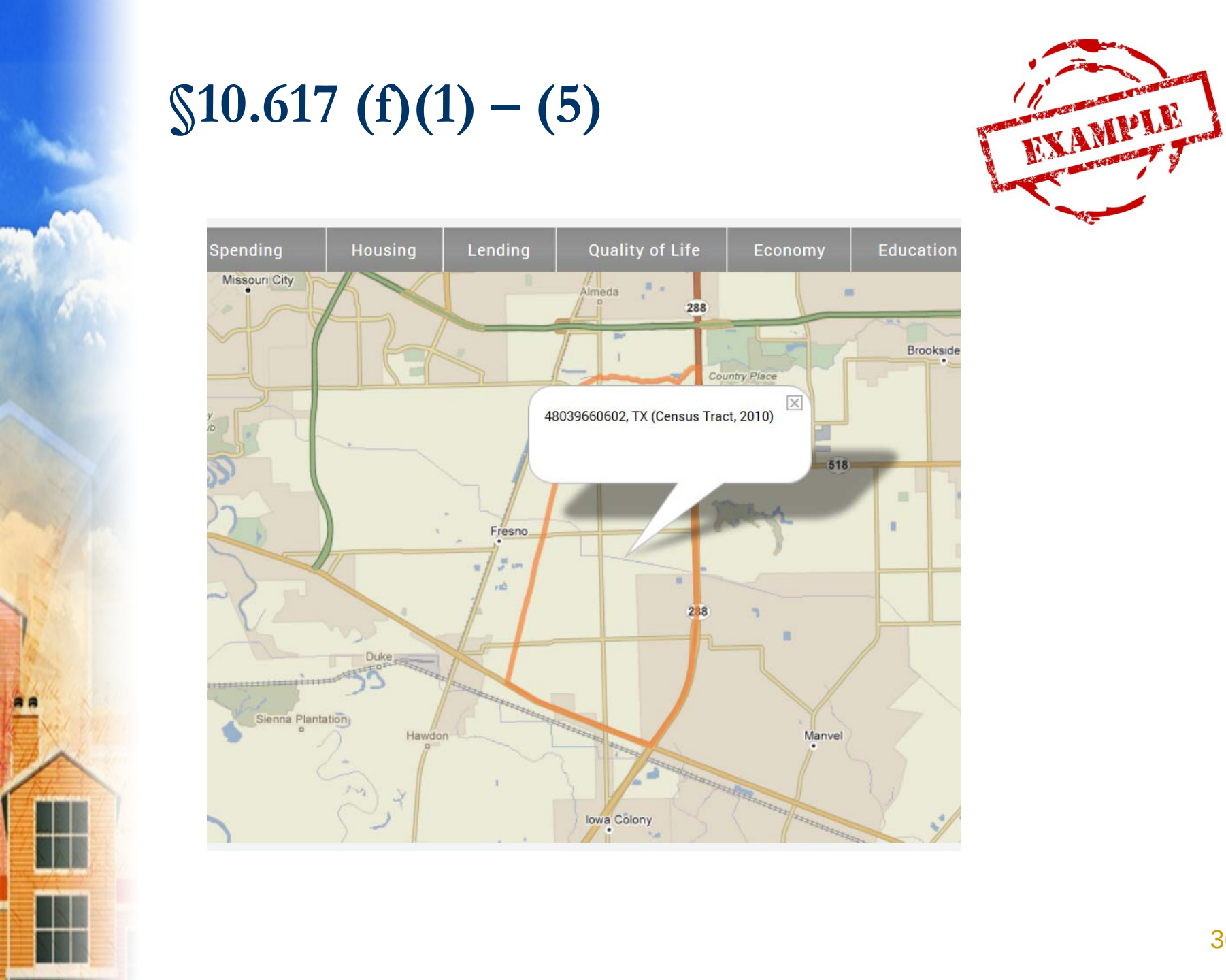


B	C	D	E	F	G	H	I	J	K
County	Census Tract	White	White - %	African American	AA - %	American Indian Alaska Native	AI AN - %	Asian	Asian - %
Brazoria County	48039660602	10468	39	7442	27.7	115	0.4	5862	21.8
Fort Bend County	48157672900	11427	40	8183	28.7	112	0.4	5726	20.1
Fort Bend County	48157674400	4253	42.2	342	3.4	11	0.1	5090	50.5
Fort Bend County	48157672701	3070	21.8	4179	29.7	52	0.4	4828	34.3
Fort Bend County	48157673101	24291	73.2	2361	7.1	128	0.4	4370	13.2
Fort Bend County	48157672001	2620	30.7	1180	13.8	30	0.4	3955	46.3
Fort Bend County	48157673902	1341	23.6	237	4.2	13	0.2	3800	66.9
Fort Bend County	48157674300	3742	42.6	841	9.6	30	0.3	3759	42.7
Fort Bend County	48157673800	4308	46.1	638	6.8	36	0.4	3655	39.1
Fort Bend County	48157672301	2196	28.2	1123	14.4	41	0.5	3545	45.5
Harris County	48201452700	1696	17.1	3081	31.1	53	0.5	3545	35.8
Harris County	48201350100	7687	50.3	2553	16.7	60	0.4	3392	22.2

§10.617 (f)(1) – (5)


MAPS
TABLES
REPORTS
3-LAYER MAPS
DATA LOADER
TRF policymap
Location
Enter Addr
County, State, or Zip
Location
Census Tract
Block Group
Congressional District
Senate
School District
State District
Metro Area
My Data
Demographics
Housing
Lending
Quality of Life
Economy
Education
Salem
Oregon
Pierre
South Dakota
St Paul
Wisconsin
Michigan
Lansing
Wyoming
Iowa
Des Moines
Chicago
Nebraska
Cheyenne
Lincoln
Illinois
Indiana
Ohio
Denver
UNITED
STATES
Springfield
Indianapolis
Reno
Nevada
Utah
Sacramento
San Francisco
Colorado
Kansas
Missouri
Kentucky
Nashville
Tennessee
California
Oklahoma City
Little Rock
Oklahoma
Arizona
Los Angeles
Phoenix
New Mexico
Arkansas
Atlanta
Mississippi
Alabama
San Diego
Dallas
Jackson
Montgomery
Georgia
Louisiana
Texas
North Pacific Ocean
Austin
Baton Rouge
Tallahassee
San Antonio
Houston
Sonora
Chihuahua

§10.617 (f)(1) – (5)

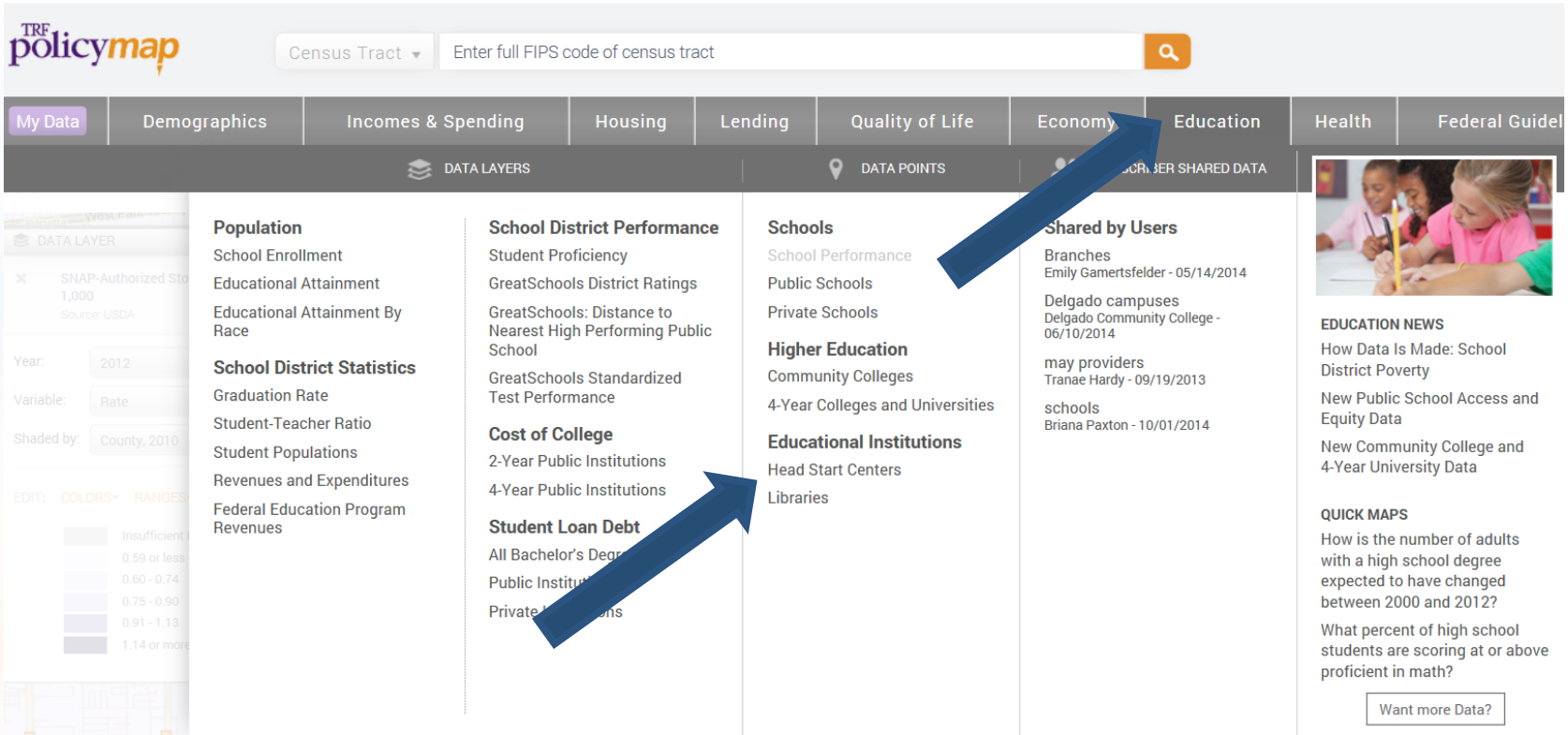

EXAMPLE

Spending
Housing
Lending
Quality of Life
Economy
Education
Missouri City
Almeda
288
Brookside
Country Place
48039660602, TX (Census Tract, 2010)
518
Fresno
288
Duke
Sienna Plantation
Hawdon
Manvel
Iowa Colony

§10.617 (f)(1) – (5)

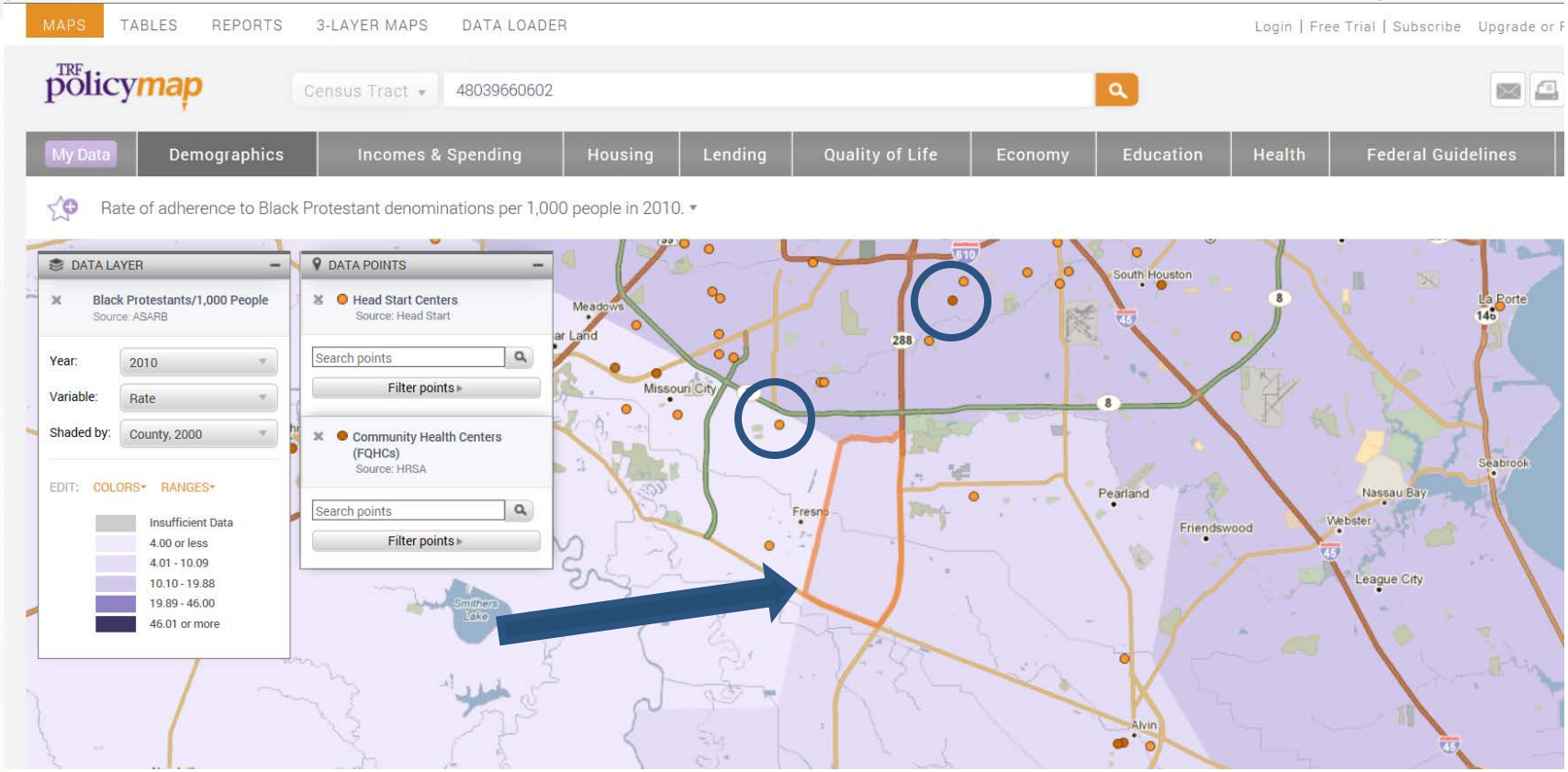
Step 3 - Find Outreach Partners

EXAMPLE



§10.617 (f)(1) – (5)

EXAMPLE


MAPS
TABLES
REPORTS
3-LAYER MAPS
DATA LOADER
Login | Free Trial | Subscribe
TRF policymap
Census Tract
48039660602
My Data
Demographics
Incomes & Spending
Housing
Lending
Quality of Life
Economy
Education
Health
Federal Guidelines
Rate of adherence to Black Protestant denominations per 1,000 people in 2010.
DATA LAYER
Black Protestants/1,000 People
Source: ASARB
Year: 2010
Variable: Rate
Shaded by: County, 2000
EDIT: COLORS RANGES
Insufficient Data
4.00 or less
4.01 - 10.09
10.10 - 19.88
19.89 - 46.00
46.01 or more
DATA POINTS
Head Start Centers
Source: Head Start
Search points
Filter points
Community Health Centers (FQHCs)
Source: HRSA
Search points
Filter points
Meadows
Missouri City
Fresno
Smithers Lake
South Houston
Pearland
Friendswood
Nassau Bay
Webster
League City
Seabrook
La Porte
Alvin
610
288
8
45
146

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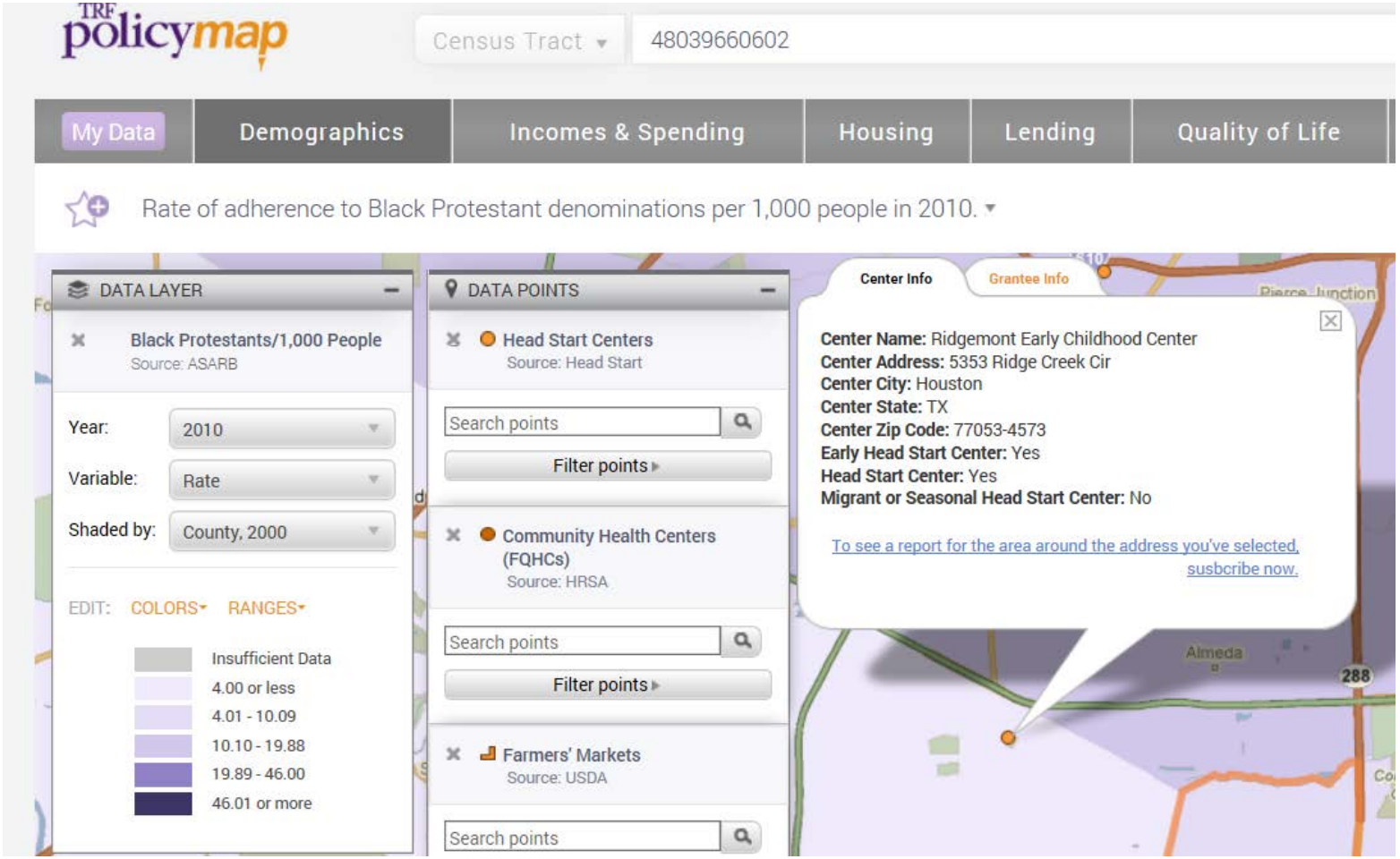
TRF policymap
Census Tract
48039660602
My Data
Demographics
Incomes & Spending
Housing
Lending
Quality of Life
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46.01 or more
DATA POINTS
Head Start Centers
Source: Head Start
Search points
Filter points
Community Health Centers (FQHCs)
Source: HRSA
Search points
Filter points
Farmers' Markets
Source: USDA
Search points
Center Info
Grantee Info
Center Name: Ridgemont Early Childhood Center
Center Address: 5353 Ridge Creek Cir
Center City: Houston
Center State: TX
Center Zip Code: 77053-4573
Early Head Start Center: Yes
Head Start Center: Yes
Migrant or Seasonal Head Start Center: No
To see a report for the area around the address you've selected, susbcribe now.
Almeda
288

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EXAMPLE

FBISD
INSPIRE • EQUIP • IMAGINE

Chat with Charles | Calendar | Schools | Family Access

community | parents | students | staff

Home | About Us | Board of Trustees | Athletics | Departments and Services | Education Foundation | Careers

Special Programs

- Department Home
- Family Literacy
- **Ridgemont Early Childhood Center**
- Social Workers
- The Program for English Language Learners
  - The Bilingual Education Program
  - The English as a Second Language (ESL) Program
- Title I
  - Title I Campuses
  - Homeless

Home > Departments and Services > Special Programs

Ridgemont Early Childhood Center

The Starting Place for Bright Futures

RIDGEMONT EARLY CHILDHOOD CENTER
Racing to Excellence

The Ridgemont Early Childhood Center houses a multi-service learning center where children and families grow together as a community of learners.

Contact Us

§10.617 (f)(1) – (5)

EXAMPLE

About DAYA | Contact Us | Home
Help Line 713-981-7645
DAYA
Serving South Asian Families
Services
Resources
Safety Tips & FAQs
Contact Us
» About Daya
» Events Calendar
» Newsletter
» Educational Materials
» Become a Volunteer
» Daya In Press
» Photo Gallery
» Tell a Friend
» Support Daya
» Survivors' Stories
» Seminar 2014
» One Voice 2014
Daya: Serving South Asian Families in Crisis
Daya promotes healthy family relationships in the South-Asian community by providing services that include counseling, referrals, legal advocacy, and financial support to women and children affected by family violence and sexual assault. Daya also promotes awareness on topics relevant to the welfare of South Asian families through educational seminars, publications, and outreach events.
Help Line: (713) 981-7645
A crisis counselor is available to answer your call
Monday-Friday, 8:00 AM to 5:00 PM
Our voicemail system is available after hours and on weekends
Asian Pacific American Heritage Association
ASIAN/PACIFIC AMERICAN HERITAGE ASSOCIATION
SERVING THE GREATER HOUSTON COMMUNITY AND BEYOND
Email
Password
Remember me
Login
Forgot password
Contact Us
HOME
ABOUT US
PROGRAMS
SPONSORS
EVENTS
SCHOLARSHIP & CONTEST
PRESS RELEASES
DONATE/TICKET
CELEBRATING 22 YEARS OF ACCOMPLISHMENTS AND HERITAGE
The City of Houston
Official Site for Houston, Texas
I Want to
Govt
Residents
Business
Departments
Visitors
En Espanol
» Health » Harris County Area Agency on Aging
HARRIS COUNTY AREA AGENCY ON AGING
Welcome to the Harris County Area Agency on Aging
The Harris County Area Agency on Aging (HCAAA) is part of a nationwide network
Health Dept Links
HEALTH DEPT. HOME PAGE
CONTACT THE HEALTH DEPT
BIRTH AND DEATH CERTIFICATES
COMMUNITY GARDEN PROGRAM
CONSUMER HEALTH

§10.617 (f)(1) – (5)

Step 4 – Review Media & Advertising Options

§10.617 (f)(1) – (5)

Step 5 – Fill out your Affirmative Marketing Plan

EXAMPLE

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)

Made Up Development
Houston, TX 78888

1b. Project Contract Number

CMTS 1500

1c. No. of Units

197

1d. Census Tract

48201510200

1e. Housing/Expanded Housing Market Area

Expanded Housing Market Area: Houston-The Woodlands-Sugar Land MSA

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)

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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.

The regional manager will receive and track referral sources and review this plan in 2 years to determine: 1) Which referral sources were successful in referring "least likely to apply" groups, and 2) Whether there has been any positive change in the property's tenant pool demographics. If there has been no change or only a limited amount of success, the regional manager will:

1) Complete an evaluation of efforts to date, including a review of the media and outreach organizations/contacts used and what has been successful in bringing more "least likely to apply" groups to the property,

2) Gather a list of new community resources that might work with "least likely to apply" groups, and

3) Revise the plan to include new strategies and more frequent outreach efforts (i.e., more coordinated events or outreach efforts quarterly rather than annually).

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8. Additional Considerations Is there anything else you would like to tell us about your AFHMP to help ensure that your program is marketed to those least likely to apply for housing in your project? Please attach additional sheets, as needed.

In looking at 5 year ACS data for languages spoken at home, the regional manager found that 248,366 residents of the MSA who speak an Asian or Pacific Islander dialect identified themselves as speaking English "less than well". Fifty census tracts in the Houston MSA include over 1,000 households speaking English "less than well", the top 10 of which include census tracts in Brazoria, Fort Bend, and Harris Counties. The property distributed fliers translated into three primary Asian dialects to outreach partners serving these areas. 5 year ACS data also showed that 769,535 residents of the MSA who speak Spanish identified themselves as speaking English "less than well". Two hundred ninety one census tracts in the Houston MSA include over 1,000 households speaking English "less than well". Since Spanish is the language in greatest demand based on ACS data, the property will translate one of its property brochures into Spanish and serve prospective residents by setting up an account with the Red Cross Language Bank for translation services.

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Asian	Ridgemont Early Childhood Center (Silvia Bland, 713-661-5595, P.O. Box 515 Houston, TX 76123); Silvia is the Bilingual Coordinator. Contact will begin on April 1, 2015. A property tour will be scheduled for Ridgemont participants. Daya (Carole Ameen, 713-333-3445, P.O. Box Textfield0 Houston, TX 78682); Ms. Ameen is the housing counselor at Daya. (Continued...)
Persons with Disabilities	Tri-County Services (Joan Watson, 936-665-8991, 1020 Riverwood Ct Conroe, TX 77344); Ms. Watson is the housing referral and intake coordinator for the Riverwood day center and has worked with individuals with chronic mental illness for 2 years. Contact will begin on April 1, 2015. Ms. Watson will distribute property brochures to tenants seeking housing.
Hispanic	Hispanic Health Coalition (Mariana Luz, 713-666-7894, 2624 Loop E Houston, TX 77169); Ms. Luz coordinates 3 regional health fairs throughout the MSA area that include health centers, housing agencies, and employment agencies. The property will host a booth during the first fair on November 1, 2015 and will attend the 2 following health fairs.
Black / African American	S.H.A.P.E. Community Center (Jonathan Everly, 713-662-3343, 333 Almeda Houston, TX 77004); Mr. Everly coordinates the youth aftercare program and will send home brochures to parents advertising our rental property. Attendance at S.H.A.P.E.'s community fair event is being discussed for May 5, 2015.

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Newspaper(s) Southern Chinese Daily News	Asians (Chinese) - Copy attached		
Radio Station(s) KLOL-FM 101.1 FM	Hispanic (Spanish) - Copy of announcement attached		
TV Station(s)			
Electronic Media S.H.A.P.E. Bulletin	African Americans		
Bulletin Boards Hispanic Chamber			
Brochures, Notices, Flyers Tri County Service Brochue	Persons with Disabilities - Brochure attach		
Other (specify) Open House for Ridgemont	Asians - Sign in sheet attached		

Targeted_Population14

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Affirmative Marketing Tool

02/12/2015

Select a property from the drop down menu. If a property is unoccupied, a new construction property beginning lease up, or a property with fewer than 40 units, enter the census tract of the development. Select Go to view results for groups considered underrepresented in your development or area to whom you must affirmatively market.

Select a development Go Or, enter a census Tract: 48279950300 Go

The Census Tract, County, and MSA designation are displayed below. This information is based on CMTS property information. If the property or census tract provided is not in an MSA, use the MSA dropdown to widen the report to include areas in a nearby MSA. You may choose to widen your marketing area by using this feature. This is not required under the Rule.

Census Tract: 48279950300

County	Lamb
MSA	Not in an MSA

Optional: Select the nearest MSA to view larger areas to which you might market your property:

Select an MSA Go

As a reminder, persons with disabilities will always appear in your results and must always be included in your affirmative marketing. Results will not display for any populations representing less than 1% of the total population of the County or MSA. These populations will not be required in your affirmative marketing.

Census Tract vs. County

Least Likely to Apply	% Census Tract	% County	Tract for Outreach Consideration
Persons with Disabilities	12.87	12.71	48279950600
Hispanic	40.19	51.73	48279950500

Map Census Tracts

The report above shows the groups to whom you must affirmatively market based on a comparison of your tenant data pool or census tract to the applicable County or MSA area as identified in the Rule. You must select these groups on the HUD 935.2A form as groups least likely to apply.

The census tracts provided for outreach consideration represent nearby neighborhoods identified in the U.S. Census as having the greatest number of the groups who are least likely to apply at your development based on its location or the demographic make up of its tenant pool. The identified neighborhoods may represent a first step for planning meaningful outreach and marketing for your development.

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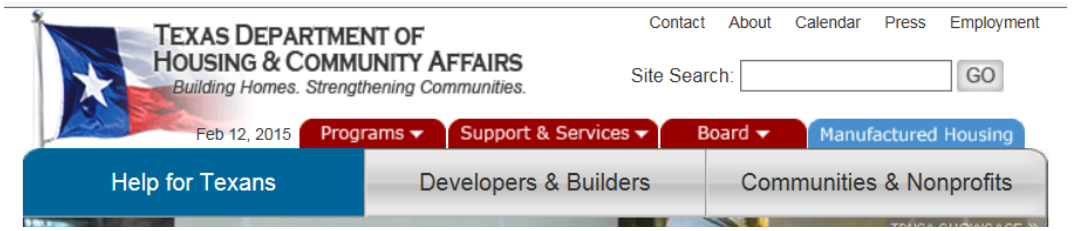
EXAMPLE



« Emergency & Homeless Services

Emergency housing resources such as short-term rental payments (including **eviction relief** and legal aid services), homeless shelters, and other basic necessities for low-income Texans.

STEP 2 **Enter your city or county:**

City: OR County: Lamb ×

LAMB

STEP 3 Find Help

Assistance Provider Results

	City	
Texas Information and Referral Network (Dial 2-1-1)	AUSTIN	1 - (877) 541-7905
South Plains Community Action Association, Inc.	LEVELLAND	1 - (806) 894-6104
South Plains Area Agency on Aging	LUBBOCK	1 - (806) 762-8721
Legal Aid of Northwest Texas - Plainview Office	PLAINVIEW	1 - (806) 293-8491

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EXAMPLE

Need HELP?
Search our statewide database of social service resources using the options below!
Search by Service Type:
Click on the icons below to search for services by Category:
HOUSING & SHELTER
FOOD ASSISTANCE
FINANCIAL & LEGAL
EMPLOYMENT HELP
HEALTH SERVICES
MENTAL HEALTH SERVICES
CRISIS & EMERGENCY
CHILD CARE & EDUCATION
AGING & DISABILITY
VETERANS ASSISTANCE
OR you can Search by Keyword and Zip Code:
Enter a keyword AND zip code below to search for services:
Enter Keyword:
Try using quotations, such as "food pantry", or "homeless shelter".
AND
Enter Zip Code:
ZIP Code Lookup
SEARCH
Still not finding what you need?
DIAL 2-1-1

How these changes affect monitoring:

- Compliance will look for:
  - Community contacts at organizations you will use to help facilitate your outreach (at least one should be noted for each group but more are encouraged)
  - Advertising or marketing materials distributed in the MSA or County, as documented by:
    - Letters, event listings, online listings, copies of publications or media announcements, or other sufficient evidence
  - Samples of property brochures or marketing materials (showing English/Spanish contact and RA information and the FHEO logo)
  - Plans that include considerations for limited English proficiency (as an attachment or in Section 8 of the 935.2A)

Affirmative Marketing Timeframes

- (g) Timeframes
  - (g)(1) An Owner must begin its affirmative marketing efforts for each of the identified populations at least six months prior to the anticipated date the first building is to be available for occupancy.
    - As a condition of an award to a new Development, the Board may require affirmative marketing efforts to begin more than six (6) months prior to the anticipated date the first building is to be placed in service;

Affirmative Marketing Timeframes

- (g) Timeframes
  - (g)(2) An Owner must update its Affirmative Marketing Plan and populations that are least likely to apply at least every two (2) years from the effective date of the current plan *or, for HUD/USDA properties, as otherwise required by HUD/USDA.*

Affirmative Marketing Timeframes

- (h) Biennial Plan Review.
  - The plan must include how, and by whom, data will be collected and evaluated, how often the plan will be re-evaluated, and how the re-evaluation will be completed.
  - If a population remains underrepresented, there has been a negative change, or only a limited amount of success, the Owner must:
    - (h)(1) Complete an evaluation of efforts to date and gather a list of community resources available for use
    - (h)(2) Revise the Affirmative Marketing Plan to include a:
      - Wider distribution area,
      - New strategies for outreach,
      - More frequent outreach efforts.

Affirmative Marketing Timeframes

- (i) Record keeping.
  - Owners must maintain records of each Affirmative Marketing Plan and specific outreach efforts completed for the greater of 3 years or the recordkeeping requirement identified in the LURA.
- (j) Exception to Affirmative Marketing.
  - If the development has closed its waiting list, Affirmative Marketing is not required. Affirmative Marketing is required as long as the Owner is accepting applications, has an open waiting list, or is marketing prior to placement in service as required under paragraph (g)(1) of this section.

How these changes affect monitoring:

- Compliance will look for:
  - The current and previous affirmative marketing plan (with back up from the Department Tool) showing evidence of an evaluation and changes made as a result of the evaluation (if property results were unchanged or showed a small level of success).

Things to Consider

- In some areas and developments, the Tool will reflect White or Non-Hispanic as a "least likely to apply" population.
- Outreach agencies will likely not only serve the identified “least likely to apply” population.
- Affirmative marketing is about developing opportunities for inclusion, not exclusion. Your affirmative marketing goals should never affect a tenant’s eligibility for housing.
- The data published for the tenant pool is only as good as your data entry in CMTS. If your CMTS data needs updating or fixing, use census tract data and note your use of the alternative methodology.

Things to Consider

- In some areas and developments, the Tool will reflect White or Non-Hispanic as a "least likely to apply" population.
- Outreach agencies will likely not only serve the identified “least likely to apply” population.
- Affirmative marketing is about developing opportunities for inclusion, not exclusion. Your affirmative marketing goals should never affect a tenant’s eligibility for housing.
- The data published for the tenant pool is only as good as your data entry in CMTS. If your CMTS data needs updating or fixing, use census tract data and note your use of the alternative methodology.

Best Practices

- Invest some time in finding good community partners who want news of your vacancies. Take time to learn about your partners' needs.
- In outreach letters, include when applications will be accepted and describe your basic eligibility information; include information on how applicants can apply, send a brochure, and include the Fair Housing logo.
- Review your advertising materials for potential problems with representative language or photo models (if you use human models).
- Work to establish understanding and trust with your partners. Do they understand how your program works? Are they likely to refer applicants? Why or why not?
- Collect information on how an applicant heard about your development; if you see positive results in your tenant pool data during your bi-annual review, it will help you determine which relationships are working and which may need to be re-evaluated.

Self Test: How did you do?

- True: The New Rule is effective April 1, 2015.
- False: The New Rule requires use of the newest version of the 935.2A form.
- False: The New Rule uses Zip Codes to determine the market area for persons least likely to apply.
- True: The New Rule provides different methods for determining "least likely to apply" populations in developments beginning lease up, with less than 40 units, and those which may have insufficient tenant data.
- False: The New Rule requires Owners to translate all of their marketing materials.

Questions?

A list of FAQs will be posted and a survey will be emailed out following our training series on the new rules.

Contact:

Laura DeBellas, Fair Housing Team Lead

(512) 936-7366

laura.debellas@tdhca.state.tx.us

Stephanie Naquin, Director of Multifamily Compliance

(512) 475-2330

stephanie.naquin@tdhca.state.tx.us

EQUAL HOUSING OPPORTUNITY