

## **AFFIRMATIVELY FURTHER FAIR HOUSING MARKETING & MINORITY OUTREACH GUIDELINES AND REQUIREMENTS**

Affirmative marketing provides information and otherwise attracts eligible persons to available housing without regard to race, color, national origin, religion, sex, disability, and familial status. Familial status refers to households with children, households seeking custody of children, or women who are pregnant.

Illinois fair housing laws provide additional protections against discrimination on the basis of ancestry, age, military or military discharge status, marital status, protective order status, and sexual orientation.

All City of Rockford staff, sub-recipients, developers, owners, and sponsors should follow these guidelines.

### **Marketing Tools:**

1. Brochures
2. Yard signs which include the following: "In cooperation with the City of Rockford and HUD 779-348-7162"
3. Flyers (from small inserts to large posters)
4. Fair housing poster: A poster must be posted at work site and in offices of the organization.
5. Fair housing booklets: Must be available at all offices and showings of unit/property; each assisted homeowner, homebuyer, or tenant must sign a form confirming they received a copy.

### **Requirements:**

1. A marketing plan shall be in place that identifies the marketing tasks, associated costs and person responsible for carrying out each task.
2. Maintain reports which include the number of inquiries, showings, open houses, ads placed, and if the application was approved/denied/not accepted.
3. Required steps when an accessible unit becomes vacant, regardless of the status of the waiting list:
  - a. First offer the unit to a current occupant of the property who might require or benefit from the accessibility feature(s) of the unit;
  - b. Second, offer the unit to an eligible qualified applicant on the waiting list who requires the accessibility feature(s) of the unit; and
  - c. Last, offer the unit to a non-disabled person on the waiting list. A non-disabled tenant may rent an accessible unit only when all reasonable efforts to attract a tenant with a disability have been made. The lease shall include a provision that requires the non-disabled family to move into a non-accessible unit of the same size if a family that requires the accessible features of their unit applies and is eligible for the unit.
4. Include the Fair Housing logo (below) on all marketing material including ads in the newspaper.  
<http://portal.hud.gov/hudportal/HUD?src=/library/bookshelf11/hudgraphics/fheologo>



### **Additional Recommendations:**

1. Initial signage indicating the development was made possible with funding provided by the City of Rockford and HUD.
2. Four clear and brief message points about why people should buy/rent or rent (such as the quality of renovation, value for the dollars, ease of maintenance, etc.).
3. Use of a fair housing statements on brochures and flyers such as: It is the policy of the *(insert name of agency)* to provide services without regard to race, color, religion, national origin, ancestry, age, sex, familial status, physical handicap or disability.

### **Ways to promote housing units:**

Organizations may not only rely on referrals. All marketing efforts should specifically target potential tenants and homebuyers who are least likely to apply for the housing (including limited/preferred special needs populations; i.e. homeless) in order to make them aware of available affordable housing opportunities.

Some examples of ways to promote housing units are as follows:

#### **Required forms of marketing for both homebuyer & rental developments**

#### **Required forms of marketing for homebuyer developments**

1. Newspapers, including papers serving protected populations
2. Radio
3. Web site
4. Social Media such as Facebook, Instagram, Twitter, Next Door
5. Community Organizations (A minimum of one organization serving protected populations. Examples: Goodwill, La Voz Latina, etc.)
6. Places of worship
7. Neighborhood groups (Please work with City staff if you need to contact information for neighborhood groups in the area.)
8. Multiple Listing Service through use of a Realtor
9. [www.flatfeelistings.com](http://www.flatfeelistings.com) (homebuyer projects)
10. Craig's List
11. Community Fairs/events
12. Advertise at the property and/or host open houses
13. Mass Mailings; including areas serving protected populations
14. Press releases

15. Billboards
16. Community Boards (local restaurants, gas stations, etc.)
17. In the neighborhood through flyers and workshops
18. School District handouts/kids bringing home to parents, newsletters
19. Organizational workshop
20. Employment centers
21. Housing counseling agencies
22. Fair housing groups

### **Minority Outreach:**

The Developer must established and oversee a minority outreach program to ensure the inclusion, to the maximum extent possible, of minorities and women, and entitles owned by minorities and women in all contracts.

The City of Rockford’s Minority and Women Business Enterprise Procurement Policy that was rewritten and approved by City Council as 2019-155-O on July 3, 2019 states the following:

*Statement of Policy: The City of Rockford is committed to ensuring nondiscrimination in the award of City contracts and the participation of certified Minority and Women Business Enterprises (MWBEs) in its procurement of commodities and services. The City will work to remove barriers to the full participation of MWBEs in the award of such contracts by taking a proactive role in facilitating the development and certification of such businesses and enforcing compliance with all local, state, and federal nondiscrimination and equal employment opportunities statutes, as well as this policy.*

*Policy Objectives: To ensure full implementation of and compliance with this policy, the City will:*

- A. *Establish a local program for certifying minority – and women-owned business enterprises as those entities are defined in this policy.*
- B. *Establish proactive policies and procedures which promote full participation by MWBEs in bidding on all City procurement offerings and requests for proposals, including procedures to identify and mitigate or eliminate obstacles to MWBE participation.*
- C. *Establish and enforce procurement policies and procedures which support participation in City procurement offerings by business entities whose subcontracting practices are non-discriminatory.*
- D. *Establish annual MWBE utilization goals commencing one (1) year from the adoption of this policy, based upon data collected in previous years(s). These goals shall be aspirational and shall serve only as a measure of the effectiveness of this Policy; goals shall not be imposed upon any individual contract or subcontract.*

### **Monitoring:**

The following must be made easily accessible at the time of a monitoring visit:

1. Copies of documents (applications, leases, contracts for purchase, etc.) and marketing materials, including ads.
2. Clear photos of units with advertising
3. Copy of policy for review and acceptance of applicants
4. Copy of the marketing plan

5. Copy of minority outreach efforts
6. Income/race/ethnicity of tenants for assisted units at lease up with supporting documentation of income
7. Marketing reports which include reasons for applicants/tenants deciding to move elsewhere; location, quality, features, price and/or financing.

**Corrective Actions:**

After evaluating all marketing efforts, corrective actions may need to be imposed with additional monitoring required.

**Other Resources:**

1. 24 CFR Part 92.351—Affirmative marketing; minority outreach program
2. PART 109—Fair Housing Advertising
3. HUD Form 935.2 - Affirmative Fair Housing Marketing Plan. While not required, this form is a useful tool for organizing and documenting the affirmative marketing plan for owners.