

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF FINANCIAL ASSISTANCE  
HOME INVESTMENT PARTNERSHIPS PROGRAM**

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HOME Management Memo #14-02

Date: April 22, 2014

**To: HOME State Program Activity Recipients and Interested Parties**

**RE: Affirmative Marketing Plans for Program Activities**

Pursuant to new HOME requirements at 24 CFR 92.351 and 92.504 (c)(1) (vii), HOME Recipients are required to do affirmative marketing for all funded activities. For program activities (i.e. FTHB, OOR, and TBRA), **Affirmative Marketing** consists of targeted outreach efforts to market your HOME activities to protected classes that are underrepresented in your program when compared to their representation in the jurisdiction as a whole. Below are steps you must follow to: (1) determine where underrepresentation in your program exists and (2) take actions to try to reduce this underrepresentation.

The initial affirmative marketing plan shall be submitted as part of your of program general set-up documentation and updated annually thereafter when submitting the Demographic Analysis form with the HOME Annual Performance Report

(1) Determine Where Underrepresentation Exits

Complete the [Demographic Analysis Form](#) for each HOME activity that you are **currently operating**. (Instructions are on the last page of the form.) The form is designed to autofill Census data for your jurisdiction so that you can compare that data to the proportion of persons on your program applicant, beneficiary, rejected applicant, and waiting list to see what ethnicity, race, gender, and age categories are underrepresented in your program compared to the rest of the jurisdiction. Follow the instructions for retrieving data on number of disabled in the county to analyze underrepresentation for this protected class category. If any of the protected class categories on the form are underrepresented by more than 10 percentage points, that number will show up in **red**.

## (2) Take Actions to Reduce Underrepresentation

- a. **Answer the questions on page two of the form.** The questions will help you think about the reasons why any underrepresentation exists and develop a plan for increasing participation by each of the underrepresented groups.

**New Programs:** If you do not have an existing program (e.g. you are in Year 1 of an activity you have not operated recently, so you do not have data on prior program applicants, beneficiaries, rejected applicants, and wait-listed applicants), proceed with Step (2) after identifying the ethnicity, race, gender, age categories, and disability status likely to be underrepresented in the jurisdiction's program based on (a) the jurisdiction's census data and (b) your general knowledge regarding barriers to participation in that program activity-type. Discuss your assumptions on page two of the form.

- b. **Develop an Affirmative Marketing Plan** which, at a minimum, incorporates the actions described on the next page of this memo. In addition to these required actions, HOME Recipients should take additional specific actions that it believes is necessary to effectively market each of its HOME-funded activities, both jurisdiction-wide and to specific underrepresented groups, as determined through completion of the Demographic Analysis Form.

## (3) Serving Selected Populations

To the extent that an activity is implementing tenant preferences, the HOME Recipient must have affirmative marketing procedures that apply in the context of that limited/preferred tenant selection policy. For example, a project for homeless persons must be marketed to the universe of all homeless persons who could meet the preference.

**Questions on affirmative marketing requirements or how to develop an affirmative marketing plan should be directed to your HOME Representative.**

## Required Elements of an Affirmative Marketing Plan

The initial affirmative marketing plan shall be submitted as part of your of program general set-up documentation and updated annually thereafter when submitting the Demographic Analysis form with the HOME Annual Performance Report.

(1) Develop methods for informing the public, owners, and potential tenants about federal fair housing laws and the HOME Recipient's affirmative marketing policy.

At a minimum, HOME Recipients must:

- a. Use commercial media and community contacts, (for example, advertisements and media targeted to the underrepresented group(s), community organizations, places of worship, employment centers, fair housing groups, or housing counseling agencies), to advertise the availability of program funds to groups determined to be underrepresented in the program pursuant to the analysis done with the [Demographic Analysis Form](#).
- a. Make clear in all program marketing materials that funds are available without regard to race, color, national origin, sex, religion, familial status, disability, sexual orientation, or gender identity.
- b. Use the Equal Housing Opportunity logotype or slogan in press releases, program advertisements, solicitations and all other written communications concerning the program to members of the public.
- c. Use of the State of California Department of Fair Employment and Housing Fair Housing Poster:  
<http://www.dfeh.ca.gov/res/docs/Publications/Fair%20Housing%20Poster.%20DFEH%20164H.pdf>.
- d. Distribute and otherwise make readily available information about fair housing rights and responsibilities. (Fair Housing materials can be found at: [DFEH Publications](#).) Provide fair housing information to: (i) all persons who inquire about the program, (ii) all persons who apply to the program, (iii) all persons accepted for assistance, and (iv) all persons who are rejected or wait-listed.

(2) Recordkeeping. Develop and describe recordkeeping procedures for records pertaining to actions taken to market the program, both community wide, and to underrepresented groups, and records to assess the results of these actions; and

(3) Annual Evaluation. Describe how the HOME Recipient will annually assess the success of its affirmative marketing actions, and what corrective actions will be taken when efforts to reach underrepresented groups are not successful.