

Affirmative Fair Housing Marketing Plan Guide – TBRA and Homebuyer Programs

Introduction and Background

This guide was developed to assist anyone receiving HOME TBRA or Homebuyer funds from IFA to develop an Affirmative Fair Housing Marketing Plan (AFHMP) as required.

The AFHMP should demonstrate meaningful efforts to identify and attract underserved populations in the housing market area, and outline how the program will work to house both majority and minority populations represented in the housing market area to ensure that segregation/redlining does not intentionally occur.

AFHMP regulations can be found at [24 CFR 200, subpart M](#). Additional Affirmative Marketing regulations for TBRA can be found at [24 CFR 92.351](#).

What is Affirmative Marketing?

Affirmative Marketing means to understand the housing market area's demographics, identify underserved populations, implement marketing efforts beyond current or usual methods of advertising to increase a more diverse applicant pool and house a more diverse population. It often requires extra effort to directly market to underserved populations living in the housing market areas.

IFA requires **all** properties to target Persons with Disabilities, regardless of Census data information.

Affirmative Marketing should demonstrate the efforts of the owner/agent to reach underserved populations through community contacts and other direct methods of advertising.

Iowa HOME, NHTF, and LIHTC Programs

Projects that have received HUD funding are required to provide an AFHMP. For HOME, TBRA or Homebuyer Programs, a new plan is required for each new contract.

If your project also receives LIHTC or is a multifamily rental project, use the guide for LIHTC programs found on the [IFA website](#) or email [IFA](#) for a copy. All programs follow the requirements at [24 CFR 200.620](#).

Housing Protected Classes

Federal: 24 CFR 100	State: Iowa Code 216
Color	Color
Disability	Creed
Familial Status	Familial Status
National Origin	Mental Disability
Race	National Origin
Religion	Physical Disability
Sex (including gender identity and sexual orientation)	Race
	Religion
	Sex
	Sexual Orientation

Additional HUD requirements or local protected classes may expand this list. If you have a question, please reach out to [IFA](#).



Getting Started

This guidance is specific to the IFA TBRA and Homebuyer form and should not be used for a multifamily rental project or LIHTC project.

AFHMP HOME-TBRA and Homebuyer Form

All sections of the form must be completed fully.

If you wish to create your own Word tables or Excel spreadsheets for Worksheets 1 and 2, this is allowable.

- 1. Applicant Name and Address:** please include city, state, and zip code of the program's primary address. The Applicant is the organization that applied for TBRA or Homebuyer funds from IFA.
- 2. HOME project number:** This section should contain all contract project numbers associated with IFA and this project.
- 3. Person Responsible for the marketing plan and marketing oversight:** specific contact information for your program.
- 4. Marketing Target Area and Expanded Marketing Target Area:** list the area that attract the most applicants. This could be city/town, county, Coordinated Entry region, Metropolitan Statistical Area (MSA), or other. If your project serves multiple cities or counties, list them all. A lookup of MSAs can be found [here](#).
- 5. Targeted Marketing Activity:** before completing this section, Worksheet 1, Determining Demographic Groups Least Likely to Apply, must be completed. Go to [Worksheet 1](#) in this document for assistance with Worksheet 1.
- 6. Marketing Program:** attach to the completed AFHMP any marketing materials used for this program.
- 7. HUD Fair Housing Poster:** The HUD Fair Housing Poster must be conspicuously displayed and the location where the poster(s) is displayed is to be included in this section.
- 8. AFHMP/Fair Housing Act Staff Instruction/Training:** Be sure to include past and upcoming dates of training for staff, who provided/will provide the training, and the information about which staff received/will receive the training.
- 9. How will you assess the success of your Affirmative Marketing efforts?** This section should include any plan the program has to evaluate the actions taken for affirmative marketing.
- 10. What action will be taken if the Affirmative Fair Housing efforts are not met?** This section should include any action the program will take if the assessment of the affirmative marketing shows that improvements are needed.
- 11. Additional Considerations:** include any other information about your AFHMP that does not fit elsewhere in the form, such as a program serving only a specific subpopulation, or any information about the service area that may change affirmative marketing
- 12. Implementation and Review:** signature block and date for the person submitting the AFHMP and the IFA staff signing off on the AFHMP.

Worksheet 1, Determining Demographic Groups Least Likely to Apply

Worksheet 1 requires using the most current 5-year estimates from the US Census to complete. Reach out to [Bernadette Beck](#) with IFA for help with pulling accurate Census information for your service area.

Worksheet 1 will reflect the demographic data for each Project's targeted areas – depending on the Project, this could be an MSA, Coordinated Entry region, counties served by the Project, and/or cities served by the Project. A reminder that IFA requires all properties to target Persons with Disabilities, regardless of percentages listed.

IFA will provide the Census data for the Project from the most recent 5-Year ACS reports (DP05 and DP02) from the US Census Bureau. If the Census data shows a population of 1% or more in the project's service area for any demographic, that demographic should be included as a target for affirmative marketing on this plan.



Even if the project has existing participants, the analysis will be based solely on the targeted service areas, as each contract requires a new AFHMP. Evaluation of the current contract's AFHMP should be completed during the contract period.

Worksheet 2, Proposed Marketing Activity – Community Contacts

- List each targeted group separately on the worksheet and the corresponding community contact. If one agency/organization/business serves as the community contact for multiple targeted groups or service area, list all targeted groups or service areas served by that community contact in Column 1.
- Ensure you have contacted and discussed with all contacts how they can assist your property to attract targeted underserved populations. All community contacts should be known to effectively reach the targeted populations prior to including in the plan and using to market your program.
- IFA expects that each project develops and maintains positive relationships and continued communication with the contacts listed on this worksheet for the duration of the contract period.

Additional Information

Section 504 Accessibility Requirements

Section 504 of the Rehab Act makes it illegal for federal agencies, programs, or activities that receive federal financial assistance or are conducted by a federal agency, to discriminate against qualified individuals with disabilities.

Requirements under Section 504 include reasonable accommodation for employees with disabilities, program accessibility, effective communication with people who have hearing or vision disabilities, and accessible new construction and alterations.

Equal Housing Opportunity (EHO) Advertising, Property Signs, and Public Access

All advertising of residential real estate for sale, rent, or financing should contain an equal housing opportunity logo, statement, or slogan as a means of educating the home seeking public that the property is available to all persons. The choice of logo, statement, or slogan will depend on the type of media used (visual or auditory) and size of the advertisement.

Property signs shall contain the [EHO logo, statement, or slogan](#) and should be visible to anyone viewing the sign. If the sign has not been constructed when the AFHMP is submitted, provide copy of the planned sign design and content prepared by the sign manufacturer or architect. If a site sign is not used, please explain.

Symbols of Accessibility

Accessible facilities which meet the Uniform Federal Accessibility Standards (UFAS) 4.1, Minimum Requirements, may use the international symbol of accessibility. Please ensure the property meets these requirements if the symbol is used. The symbol shall be displayed as:



Public Access

Fair Housing Posters, Affirmative Fair Housing Marketing Plans, Tenant Selection Criteria, and other management policies should be displayed and made available for public review.

Instruction/Training

Employees engaged with HOME funded programs must be provided verbal and written training regarding policies of non-discrimination and fair housing, including the Fair Housing Act and Affirmative Fair



Housing Marketing. Dates, content, and anticipated training should be tracked, and copies of training materials should be kept.

Hiring Practices

Owners are required to maintain a non-discriminatory hiring policy for staff engaged in the rental of properties under Affirmative Fair Housing Marketing Regulations.

Plan Maintenance

As annual review of the AFHMP for efficacy is required. IFA recommends that programs keep files to help you establish:

- How you determined what outreach was needed.
- What actions were taken.
- When actions were taken.
- Why decisions were made to change or expand efforts.

Additionally, to assist with marketing efforts, programs can ask tenants/applicants about how they heard about the program and for race and ethnicity information, if they are willing to provide it. If the tenant/applicant declines to provide it or the race/ethnicity of the tenant/applicant is unknown, HUD requires that this percentage be tracked as “unknown”.

Still Have Questions?

Please contact Bern Beck with IFA if you have questions regarding your plan.

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