

City of Calistoga

Affirmative Fair Housing Marketing POLICY, PLAN AND PROCEDURES

Policy Authorization

Effective Date April 1, 2008

Revision Dates (1) _____ (2) _____

Authorization James C. McCann
James C. McCann, City Manager

Overview

The Affirmative Fair Housing Marketing Plan (AFHMP) is a policy, plan and marketing strategy designed to attract renters and buyers of all majority and minority groups, regardless of sex, handicap, and familial status to assisted rental units and sales of dwellings that are being marketed. The City of Calistoga and project owners must adopt affirmative marketing procedures and requirements for any housing with five or more HOME-assisted units consistent with General Plan policy, specifically Goal H-2, Objective H-2.2 of the Housing Element. Affirmative marketing differs from general marketing activities because it specifically targets potential tenants and homebuyers who are least likely to apply for the housing, in order to make them aware of available affordable housing opportunities.

Purpose

This policy establishes City guidelines regarding the development and implementation of an Affirmative Fair Housing Marketing Plan (AFHMP). The following policies and procedures apply to all City programs and projects.

Policy

1. Every City-assisted project and program must develop and carry out an AFHMP. Subrecipients and project owners must comply with the requirements of their AFHMP, which is designed to promote equal housing access for all prospective tenants and program users regardless of race, color, religion, sex, disability, familial status, or national origin.
 - a) As part of the Affirmative Fair Housing marketing strategy, subrecipients and project owners should develop information and utilize periodicals written in languages other than English to advertise their projects and programs in order to attract and serve underrepresented groups with limited English proficiency.
2. Subrecipients and owners must review their AFHMP at least every five years and update it as needed to ensure compliance.

- a) A review may indicate that revisions to the Plan are necessary. If the population of Calistoga has changed over time, marketing efforts should change accordingly.
3. All City-assisted subrecipients and project owners shall collect and provide data on race and ethnicity categories for tenants, homeowners, and program users.
 - a) City building and planning staff will provide current reporting forms.
4. Where two or more accessibility standards apply (such as Section 504 and the Fair Housing Act), the subrecipient or owner is required to follow and apply both standards so that the maximum requirements will (or will not) apply.

Marketing Plan

This marketing plan and procedure is a guide to assist the City of Calistoga and its recipients and subrecipients receiving funds. It summarizes AFHMP and Affirmative Fair Housing marketing procedures as required by the Department of Housing and Urban Development.

All applicants are required to make a "good faith effort" to carry out the provisions of the Department of Housing and Urban Development's Affirmative Marketing requirements. Good faith efforts are recorded activities and documented outreach to those individuals identified at least likely to apply. Examples of such efforts include:

1. Advertising in print and electronic media that is used and viewed or listened to by those identified at least likely to apply;
2. Marketing housing to specific community, religious or other organizations frequented by those least likely to apply;
3. Developing a brochure or handout that describes facilities to be used by buyers or renters, e.g., transportation services, schools, hospitals, industry, and recreational facilities. The brochure should also describe how the proposed project will be accessible to physically handicapped persons and describes any reasonable accommodations made to persons with disabilities; and
4. Insuring that the management staff has read and understood the Fair Housing Act, and the purpose and objectives of the AFHMP.

Marketing Procedures

Recipients and subrecipients of HOME funds through the City of Calistoga, for rental and homebuyers projects containing 5 or more HOME-assisted housing units must use affirmative marketing practices when soliciting renters and buyers.

HUD's definition of affirmative marketing is marketing efforts intended to reach those persons who are least likely to apply for HOME-assisted housing.

All project owners are required to do the following:

Outreach Documentation

At least once annually, all project owners will conduct a public outreach effort that will make available public information on all rental units that have received assistance.

1. All marketing of HOME-assisted housing will be jurisdiction-wide and all advertising will be placed in sources of wide circulation.
2. Media sources should include advertisement to a particular audience, (e.g. newspapers that serve protected classes).
3. All advertisements and brochures, and other written materials should be published in multiple languages, in order to reach non-English speaking audiences and display the equal opportunity logotype or slogan.
4. Contact organizations whose membership or clientele consists primarily of protected class members
5. The project owner must display the Equal Opportunity logo and fair housing poster in an area accessible to the public (e.g., rental office).

File Documentation

The City of Calistoga will review for compliance, project owners AFHM plan in accordance with compliance procedures as set forth in 24 CFR Part 108. All project owners must keep the following materials in the AFHM file for future monitoring of records:

1. Copies of advertisements, brochures, leaflets, and letters to community contacts.
2. Maintenance of information on the race, sex and ethnicity of applicants and tenants to demonstrate the results of the owner's affirmative marketing efforts.

In instances of noncompliance by a project owner, a finding will be issued requiring corrective action taken by the project owner in the time specified. For the period of affordability, the project owner will maintain information demonstrating compliance with the requirements of this marketing plan.

For questions regarding this policy, plan and procedures, please contact the City of Calistoga Planning and Building Department at:

City of Calistoga
Planning & Building Department
1232 Washington Street
Calistoga, CA 94515
(707) 942-2827
(707)942-2831 FAX
Planning@ci.calistoga.ca.us
www.ci.calistoga.ca.us