



Housing Finance Authority of Marion County  
P.O. Box 3102 Ocala, FL 34478

## **HOUSING FINANCE AUTHORITY OF MARION COUNTY AFFIRMATIVE FAIR HOUSING MARKETING PLAN AND PROCEDURES**

### **I. STATEMENT**

This Affirmative Fair Housing Marketing Plan and Procedures (“Marketing Plan”) is developed for the use with all Federally and State funding programs. The Plan is a commitment of the Housing Finance Authority of Marion County, now known as (HFA) as it relates to State and Federal funded participated (Grantee”) to affirmatively further Fair Housing. The HFA will share the responsibility with the public about the Federal Fair Housing laws, soliciting eligible persons without regard to race, color, ancestry, national origin, religion, sex, marital status, familial status, handicap, or age into the affordable housing market and evaluating the effectiveness of these marketing efforts.

Affirmative marketing differs from general marketing activities because it specifically targets potential tenants and home buyers who are least likely to apply for and/or purchase housing. Efforts are made to make these persons aware of the available affordable housing, this Market Plan is a guide to assist the County’s HOME Consortium and its grantees by summarizing the affirmative marketing procedures required by HUD.

This Plan is documented and maintained in the office of HFA and shall be included by reference in all HOME project proposals, made an integral part of all HOME funding agreements and HOME case files.

### **II. PUROSE**

It is the Affirmative Marketing Policy to assure that organizations, non-profit and for-profit, and local units of government which might not normally apply for funds because they are unaware of the availability of said funds:

- Be informed of possible funding availability
- Be encouraged to apply for use of funding
- Have an equal opportunity to apply for use of funding

It is the Affirmative Marketing Policy of the HFA to assure that individuals who normally might not apply for available housing units because they are socially and/or economically disadvantaged:

- Be informed of available housing units
- Be encouraged to apply for available housing units
- Have an equal opportunity to rent/own their own housing units

### **III. METHODS TO DISSEMINATE AFFIRMATIVE FAIR HOUSING MARKETING REQUIREMENTS:**

The HFA when State and Federal funding is involved has created a Affirmative Fair Housing Marketing Plan and will use the following methods to inform the public, potential tenants, potential homeowners, potential and existing for-profit developers, and potential and existing non-profit developers, and local units of government about Federal Fair Housing laws and Affirmative Fair Housing Marketing Plan and Procedures.

- A. The HFA will assist The City of Ocala, and Marion County Community Services Department to be responsible for implementing the Marketing Plan and evaluating its effectiveness as required by the HOME Program.
- B. The HFA will assist The City of Ocala and Marion County Community Services to help inform the community about its Affirmative Marketing Policy through periodic updates at public forums, Fair Housing meetings as well as training workshops with CDBG, HOME and CHDO grantees or other similar forums.
- C. At the time of available funding for rental housing development, the HFA with City and or County Community Services will provide copies of Housing Discrimination & Civil Rights brochures to the initial tenants and/or rental property owners.
- D. City or County will provide general information and telephone reference numbers to person contacting the either City or County with questions regarding Affirmative Marketing and Federal Fair Housing laws.

### **IV. REQUIRED AFFIRMATIVE MARKETING RECORD KEEPING**

In order to verify that HFA is following Marketing Plan requirements the following record keeping procedures will be required:

- A. HFA will mainly record of how funding availability was advertised (copies of advertisement, emails, etc.).
- B. Copies will be maintained of all training materials and meeting agendas where the Affirmative Marketing Policy was discussed.

#### **V. GRANTEE AFFIRMATIVE FAIR HOUSING MARKETING REQUIREMENTS**

The HFA will be following Marketing Plan policies with HOME-assisted housing units become available for rent or purchase:

- A. Incorporate and Equal Housing Opportunity statement or logo in any correspond associated with rental or home ownership opportunities developed with the use of Consortium HOME funds.
- B. All ads must contain and Equal Housing Opportunity statement or logo.
- C. Media sources should include advertisement to all particular audience (e.g., newspapers or radio stations that serve protected classes)
- D. All advertisements, brochures, and other written materials should be published in at least English and Spanish, when possible, in order to reach non-English speaking audiences ad displayed.
- E. Contact should be made with organizations whose membership or clientele consists primarily of protected class members.
- F. The project owner must display the Equal Opportunity logo and Fair Housing poster in an area accessible to the public (e.g., rental office).

#### **VI. GRANTEE REQUIRED AFFIRMATIVE MARKETING RECORD KEEPING**

In order to verify that Grantees are following Marketing Plan, the HFA in assistance with City and County requires the following record keeping procedures will be required:

- A. Grantee maintains records of how vacancies were advertised (copies of advertisements, etc.).
- B. Copies of all brochures, leaflets, and letter to community contacts shall be maintained in an easily accessible file.

- C. Grantee shall have a written policy that outlines how all applications will be reviewed and processed. Grantee records shall show how all completed and filed applications were processed including whether an applicant was accepted or unaccepted and why an applicant was not accepted.
- D. Maintain information of the race, sex, ethnicity, and whether the applicant is disabled for all applicants, homebuyers, and tenants. The Consortium will submit this information as part of its Consolidated Annual Performance and Evaluation Report (“CAPER”).

This information will be gathered when an application is taken for either a tenant or a home buyer and information will be maintained during the entire affordability period.

## **VII. CONSORTIUM ASSESSMENT OF ITS AFFIRMATIVE MARKETING POLICY**

The following actions will be taken by the Consortium to evaluate the success of its Affirmative Fair Housing Marketing Policy and that of its Grantees:

- A. The Consortium will assess the results of its Affirmative Fair Housing Marketing plan annually with a summary of “good faith efforts” taken by the Consortium as well as its Grantees in the CAPER.
- B. The Consortium will compare the information compiled in the manner described under Section V and Section VII above and evaluate the degree to which statutory and policy objectives were met. If the required steps were taken, the Consortium will determine that good faith efforts have in fact, been made.
- C. To determine results, the Consortium may examine whether specific groups in the Consortium’s service area applied for or became tenants or owners of HOME-funded units that were affirmatively marketed. If the Consortium finds that specific groups are represented, particularly Hispanics, African Americans, Asians, American Indians, persons with disabilities, and women, the Consortium will assume that represented within the context of existing neighborhood composition, the Consortium will review its procedures to determine what changes, if any, might be made to make the affirmative marketing efforts more effective.
- D. The Consortium will take corrective action if it is determined that a Grantee has failed to carry out Affirmative Marketing efforts as required. If a Grantee continues to neglect responsibilities made incumbent by the terms of the HOME

Agreement, the Consortium will consider taking one or both of the following actions:

1. Declare the Grantee disqualified from any further assistance made available under the HOME Program.
  2. Notify the Grantee of the HOME Program funds that were in violation of the terms of the HOME Agreement and the Consortium may exercise its right to require immediate repayment of the HOME funding.
- E. The Consortium will not proceed with corrective action without allowing time and effort by staff to counsel the grantee in accordance with the terms of the HOME Agreement.