Procedure on Affirmative Marketing

A. General Requirements

It is the responsibility of the Authority to conduct all marketing activities in an open and clear manner, with all marketing information available in both English and any other language used by at least ten percent of the program eligible population of the locality, containing the Fair Housing logo, and in a manner that reaches those eligible families least likely to apply.

1. Marketing and informational materials will:

1. Comply with Fair Housing Act requirements on wording, logo, size of type, etc. [[1]](#footnote-1).;
2. Describe the housing units, application process, waiting list and preference structure accurately;
3. Use clear and easy to understand terms and more than strictly English-language and other-language print media;
4. Contact agencies that serve potentially qualified applicants least likely to apply (e.g. persons with disabilities or members of racial or ethnic minority groups) to ensure that accessible/adaptable units are offered to applicants who need their features and that all minorities are notified;
5. Make clear who is eligible: low income individuals and families; working and non-working people; and people with both physical and mental disabilities; and
6. Be clear about PHA's responsibility to provide reasonable accommodations to people with disabilities.

2. In order to identify and then market effectively to those eligible families least likely to apply, PHA or its contractor shall, at least once each year perform the following actions:

1. Prepare a property-by-property demographic breakdown that identifies the number and percentage of residents who are:
2. Elderly families (Head, spouse or sole member age 62 or older);
3. Disabled families (Head, spouse or sole member a person with disabilities);
4. White/Caucasian families;
5. Black/African American families;
6. Asian families;
7. Hawaiian/Pacific Islander families;
8. Native American/Alaska Native families;
9. Hispanic/Latino families;
10. Non-Hispanic/Non-Latino families;
11. Prepare a breakdown of each site-based waiting list and any citywide waiting list that breaks down the number and percentage of applicants by the categories listed above;
12. Using the most recent demographic information for the City, the PHA shall determine the number and percentage of income eligible families, first all eligible families using the categories above, then subdividing the eligible families by income tier and the categories above as follows:
13. Extremely low income families (incomes less than 30 percent of area median income, adjusted for family size);
14. Very low income families (incomes between 31 and 50 percent of area median income adjusted for family size);
15. Tax credit eligible families (incomes up to 60 percent of area median income adjusted for family size);
16. Lower income families (incomes between 50 and 80 percent of area median income adjusted for family size).
17. Compare the data on property demographics and waiting list demographics to the citywide eligible family data to determine whether there are any categories of eligible families who are under-served (i.e., 10 percent or more difference) by age, disability, race or ethnicity.
18. Using data on unit turnover, determine the number, size, type (accessible, adaptable and non-accessible/adaptable) and locations of apartments likely to become vacant in the next 12 months.
19. Review the applicable waiting lists against the likely availability projections from step (e) above, and determine whether any waiting lists that are presently closed will be re-opened.
20. If there are any under-served categories of families (step d), determine where those families are currently located and which income tier they fall under, and design a marketing campaign to reach those families.
21. The campaign should, at a minimum,
22. be aimed at families for whom the waiting list is open;
23. be presented in the appropriate language;
24. use all appropriate media;
25. describe the housing opportunities available at PHA simply but accurately;
26. contain both the Fair Housing Logo and Fair Housing language;
27. describe how an interested family can get additional information about PHA’s housing opportunities.

1. 24 CFR §109.30(a) [↑](#footnote-ref-1)