

Office of Program Monitoring Fair Housing Division Affirmative Marketing Plan

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# INSTRUCTIONS TO COMPLETE THE DHCD AFFIRMATIVE MARKETING PLAN (AMP)

**Send completed form to:** DC Dept. of Housing and Community Dev., 1800 Martin Luther King Jr., Ave., S.E., 2<sup>nd</sup> FI.; Washington, D.C. 20020

Attention: (Your) Project Manager

Each applicant for program grant funding is required to carry out an *affirmative program to attract prospective participants of all minority and non-minority groups* into the program/facility services regardless of their race, color, national origin, disability, familial status, religion, or sex. The protected groups in the program market area who may be subject to discrimination include: White, Black or African American, African (Ethiopian or other), Hispanic or Latino (immigrants or descendants), Asian (Chinese and Vietnamese immigrants or descendants), persons with disabilities, families with children, or -- American Indian or Alaska Native, Native Hawaiian or Other Pacific Islander-- where applicable by census data.

The applicant shall describe in the AMP the proposed activities to be carried out during advance marketing, where applicable, and during the initial construction of the facility or advertisement of services. The affirmative marketing program should also ensure that any group(s) of persons ordinarily not likely to participate in the program or benefit from the services provided by the facility without special outreach (See Part 3), know about the program/ services, feel welcome to apply and have the opportunity to participate.

Completion of this form, including collection of information is estimated to average three (3) hours;<sup>1</sup> including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information). The AMP is needed to ensure that all of our funding subrecipients are taking the necessary steps to eliminate discriminatory practices involving federally and locally funded programs. No application for funding of a program service or a facility development which provides services to the general public can be funded without an approved AMP. The responses are required to obtain or retain a benefit under federal and local equal opportunity regulations. The form does not contain confidential questions. DHCD follows the federal guidelines in affirmative marketing by ensuring its subrecipients abide by non-discriminatory practices in housing and non-housing projects regardless of funding source.

## Applicability:

This form is to be completed by <u>all</u> DHCD subrecipients who have submitted an application through a Request for Applications (RFA), Notice of Funding Availability (NOFA) or Request for Proposal (RFP) process to provide non-housing related services or for non-housing construction of facilities which will house services to target populations and the general public.

## Part 1-Applicant and Project Identification.

Blocks 1a thru 1f- Self-Explanatory. Block 1g-the applicant should specify the approximate date for starting marketing activities to the groups targeted for special outreach and the anticipated date of program services. Block 1h-the applicant should indicate the program market area, in which the facility/program will be (is) located (by Ward and Neighborhood name). Block 1i – the applicant may obtain census tract location information from local planning agencies, public libraries and other sources of census data. Block 1j the applicant should complete only if the Program Manager (the Manager can not be the applicant) is implementing the AMP.

## Part 2-Type of Affirmative Marketing Plan:

Applicants providing program services should check 'both' the Program Plan and indicate the status of the AMP, e.g. 'New' or 'Update'. In addition, an amendment or extension to a current grant requires a new Annual Plan' if a year has passed since the initial or last AMP was submitted.

All Project and Annual Plans should indicate the racial composition of the program market area in which the facility/program will be (is) located by checking one of the three choices. Programs with training centers in various city locations should submit an Annual Plan that reflects the racial composition of each of the program market areas in which the facility/program will be (is) located. For example, if an economic development or housing counseling organization plans to use training centers in both minority (including areas with heavy ethnic concentrations within minority areas) and non-minority areas, **a separate** AMP shall be submitted for each program market area.

## Part 3-Direction of Marketing Activity.

Indicate which group(s) the applicant considers as *LEAST LIKELY* to apply to the program/facility services without special outreach efforts.

Consider factors such as: Limited Language Proficiency (LEP) and No English Proficiency (NEP) populations, cultural diversity of sponsoring program, racial/ethnic characteristics of program market area in which facility will be (is) located in comparison to the entire city population, disability or familial status of eligible population, public transportation routes, etc.

Demographic data can change considerably over a period of time, e.g., ten year old data is not an appropriate measure to decide marketing strategies. It is the responsibility of the applicant and or it's designee to research and analyze current demographic information using appropriate resources. Out of date information on demographic shifts may impact the marketing efforts of target ethnic, racial or any other group listed under question #3. The term "significant" refers to a statistical measure in terms of numbers or percentages as compared to the city's total population.

NOTE: The Language Access Act of 2004 designates a significant population, one which is of "limited or no-English proficiency population that constitutes 3% or 500 individuals of the populations being served or encountered or likely to be served or encountered..."

NOTE: Ethnic Categories--The African category refers to persons from the continent of Africa. In the District of Columbia, persons from Ethiopia represent a significant segment of this population. The Asian

<sup>&</sup>lt;sup>1</sup> According to HUD Form 932,5 Affirmative Fair Housing Marketing Plan

category refers to persons from Asian countries to include India and the Philippines. However, demographically in the District of Columbia, the represented Asian communities with significant populations are the Chinese and Vietnamese. These two communities have distinct cultures and languages.

NOTE: The Disability community is represented by various local and federal organizations which are located in the District. Persons with disabilities may include persons with mental as well as physical disabilities. The definition for Disability can be found in the Fair Housing Act (42 U.S.C. §3601 et seq.,) and the D.C. Human Rights Act of 1977.

### Part 4-Marketing Program.

The applicant shall describe the marketing program to be used to attract all segments of the population but specifically those groups designated in Part 3 of this AMP as *least likely* to apply.

The applicant shall state: the type of media to be used to target the SPECIFIC target populations listed; the names of pertinent newspaper/call letters of target radio or TV stations; the identity of the circulation or audience of the media identified in the AMP (e.g., White, Black/ African American, Hispanic/Latino, Asian-Chinese, Asian-Vietnamese, African-Ethiopian, persons with disabilities, and/or families with children) and the size or duration of newspaper advertising or length and frequency of broadcast advertising. This section refers ONLY to marketing activities targeting the populations selected under question #3. Please attach information on the overall marketing campaign to attract all segments as an addendum.

**Community contacts** include individuals or organizations that are well known in the housing market area or the locality, that can influence persons within groups considered least likely to apply; i.e. those selected under part 3. Such contacts may include, but need not be limited to: neighborhood, minority and women's organizations, grass root faith-based or other community based organizations, labor unions, employers, public and private agencies, disability advocates, schools and individuals who are connected with these organizations and/or are well-known in the community. If assistance by such groups is limited to referrals, the applicant must state how they will keep track of applicants referred by these organizations. Applicant should notify DHCD–Fair Housing Division of any changes to the list in Part 4c of the AMP.

#### Part 5-Future Marketing Activities.

Self explanatory. Please denote marketing activities targeting the general public separately from those activities targeting groups selected under question #3.

#### Part 6-Experience and Staff Instructions.

**6a**. The applicant should indicate whether staff listed under item 1j as assigned to this project have previous experience in marketing programs to group(s) identified "as least likely" to participate in the program or facility services for the services being offered.

**6b**. Describe and submit the company instructions and list of training material provided or to be provided to staff identified under 6a (and any additional staff which may have contact with prospective participants).

The material and instructions to staff must include information on Federal, State and local fair housing laws as well as the regulations for this AMP. Copies of any written materials advertising services or

opening of the facility should be submitted with the AMP, if such materials are available.

Staff resumes and bios in lieu of an answer to part 6a and 6b WILL NOT be accepted.

### Part 7-Additional Considerations.

In this section describe other groups to which the program/facility services may be marketed to and efforts not previously mentioned which are planned in order to attract persons 'least likely' to participate or benefit from the program. Such efforts may include outreach activities to grass root faith-based/community based organizations, ethnic groups or LEP/NEP immigrant groups.

## PART 8- Notice of Intent to Begin Marketing.

No later than *90 days prior* to the initiation of program/service marketing activities, the applicant of an approved AMP shall submit to DHCD a 'notice of intent to begin marketing'.

The notification is to be submitted either by e-mail to <u>soniap.gutierrez@dc.gov</u>, or by fax (202) 645-5884 to the Office of Program Monitoring- Fair Housing Division. The notification can also be submitted to the assigned Program Manager within the Residential and Community Services Division or Project manger within the Development Finance Division. Failure to submit the notification can be grounds for a 'Concern Letter' which will require immediate recipient remediation for full compliance.

## Part 9-Review and Update.

By signing, the applicant assumes full responsibility for the AMP implementation and its required reviews and updates. DHCD may monitor the implementation of this AMP at any time and request modification in its format or content, when deemed necessary.

Non-compliance with the execution of the AMP will be grounds for a 'Non-compliance Finding' which can lead to suspension of DHCD funding.

If you have any questions regarding this form, you may contact:

Sonia P. Gutierrez Fair Housing Program Coordinator Office of Program Monitoring DC Department of Housing and Community Development 1800 Martin Luther King Jr., Ave. S.E. Washington, DC 20020 (202) 442-4238 soniap.gutierrez@dc.gov

Previous AMP editions are obsolete

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