

Affirmative Fair Housing Marketing (AFHM) Plan – Multifamily Housing

U.S. Department of Housing and Urban Development
Office of Fair Housing and Equal Opportunity

OMB Approval No. 2529
(exp. 8/31/2013)

1a. Project Name & Address (including City, County, State & Zip Code)

Golden Haven
505 N. 2nd Street
Temple, TX 76501
Bell County

1b. Project Contract Number

TX16-0011-022

1c. No. of Units

100

1d. Census Tract

207.01

1e. Housing/Expanded Housing Marketing

Temple / Bell County

1f. Managing Agent Name, Address (including City, State & Zip Code), Telephone Number & Email Address

Barbara Bozon, Executive Director
Same as Owner - see 1g.

1g. Applicant/Owner/Developer Name, Address (including City, State & Zip Code), Telephone Number & Email Address

Temple Housing Authority, P. O. Box 1326, Temple, TX 76503-1326
254-773-2009 execdir@centexhousing.org

1h. Entity Responsible for Marketing (check all that apply)

Owner Agent Other (specify) _____

Position, Name (if known), Address (including City, State & Zip Code), Telephone Number & Email Address

Barbara B. Bozon, CPA Temple Housing Authority, P. O. Box 1326, Temple, TX 76503-1326
Executive Director 254-773-2009 execdir@centexhousing.org

1i. To whom should approval and other correspondence concerning this AFHM Plan be sent? Indicate Address (including City, State & Zip Code), Telephone Number & Email Address in addition to Name.

Same as 1h.

2a. Affirmative Fair Housing Marketing Plan

Plan type Updated Plan / Date:

Reason(s) for current update:

2b. HUD-Approved Occupancy of the Project (check all that apply)

Elderly

Family Mixed (Elderly/Disabled)

Disabled See Attachment 1

2c. Date of Initial Occupancy

2d. Advertising Start Date

Advertising must begin *at least* 90 days prior to initial or renewed occupancy.

Date advertising began or will begin

For existing projects, select below the reason advertising will be used:

To add to waiting list (which currently has individuals)

To reopen closed waiting list (which currently has individuals)

3a. Demographics of Project and Marketing Area
Complete and submit Worksheet 1.

3b. Targeted Marketing Activity

Based on your completed Worksheet 1, indicate which demographic group(s) in the housing market area is/are *least* likely to apply for the housing without special outreach efforts. (check all that apply)

- White American Indian or Alaska Native Asian Black or African American
 Native Hawaiian or Other Pacific Islander Hispanic or Latino Persons with Disabilities
 Families with Children Other ethnic group, religion, etc. (specify)

4a. Residency Preference

Is the owner requesting a residency preference? If yes, complete questions through
If no, proceed to Block 4b.

(1) Type

(2) Is the residency preference area:
The same as the AFHM Plan housing/expanded housing market area (as determined in Block 1e)?

The same as the residency preference area of the local PHA in whose jurisdiction the project is located?

(3) What is the geographic area for the residency preference?

(4) What is the reason for having a residency preference?

(5) How do you plan to periodically evaluate your residency preference to ensure that it is in accordance with the non-discrimination and equal opportunity requirements in 24 CFR 5.105(a)?

Complete and submit Worksheet 2 when requesting a residency preference (see also 24 CFR 5.655(c)(1) for residency preference requirements. The requirements in 24 CFR 5.655(c)(1) will be used by HUD as guidelines for evaluating residency preference requirements consistent with the applicable HUD program requirements. See also HUD Occupancy Handbook (4350.3) Chapter 4, Section 4.6 for additional guidance on preferences.

4b. Proposed Marketing Activities: Community Contacts

Complete and submit Worksheet 3 to describe your use of community contacts to market the project to those least likely to apply.

4c. Proposed Marketing Activities: Methods of Advertising

Complete and submit Worksheet 4 to describe your proposed methods of advertising that will be used to market to those least likely to apply. Attach samples of advertisements, radio and television scripts, Internet advertisements and websites, brochures, etc.

5a. Fair Housing Poster

The Fair Housing Poster must be prominently displayed in all offices in which sale or rental activity takes place (24 CFR 200.620(e)). Check below all locations where the AFHM Plan will be displayed. (Check all that apply)

- Rental Office Real Estate Office Model Unit Other (specify)

5b. Affirmative Fair Housing Marketing Plan (AFHM Plan)

The AFHM Plan must be available for public inspection at the sales or rental office (24 CFR 200.625). Check below all locations where the AFHM Plan will be made available. (Check all that apply)

- Rental Office Real Estate Office Model Unit Other (specify)

5c. Project Site Sign

All Project Site Signs should include the Equal Housing Opportunity logo, slogan, or statement (24 CFR 200.620(f)). Check below all locations where the Project Site Sign will be displayed. (Check all that apply)

- Rental Office Real Estate Office Model Unit Entrance to Project Other (specify)

The size of the Project Site Sign will be

The Equal Housing Opportunity logo or slogan or statement will be

Evaluation of Marketing Activities

Explain the evaluation process you will use to determine whether your marketing activities have been successful in attracting the group(s) least likely to apply, how often you will make this determination, and how you will make decisions about future marketing based on the evaluation process.

Housing staff will account for all potential residents who visit the office seeking housing. Housing staff will file a report on each resident candidate, assessing ethnicity and how the potential resident heard about the property. Reports will be completed and reviewed quarterly to determine if the current marketing activities have been successful in attracting and housing the groups least likely to apply. A successful outcome will be measured by housing groups least likely to apply. Based upon these results, future marketing will be revised to attract and house persons least likely to apply, at a level, comparable with the representation in the census tract(s).

In our marketing activities, our agency will account for patterns of racial or ethnic segregation and will develop an effective strategy for affirmative marketing.

Temple Housing Authority will review quarterly the resident population statistics to determine if they are reasonably close to the community's statistics as far as race, ethnicity and disability factors. If there is under-representation in any categories, marketing will be adjusted as needed by reaching out to organizations that serve that population. See attached report for the second quarter of 2011. (Attachment 2)

7a. Marketing Staff

What staff positions are/will be responsible for affirmative marketing?

Director of Housing
Brenda Gurnett

7b. Staff Training and Assessment: AFHM Plan

(1) Has staff been trained on the AFHM Plan?

(2) Is there ongoing training on the AFHM Plan and Fair Housing Act issues in general?

(3) If yes, who provides it?

Brenda Gurnett
Director of Housing

(4) Do you periodically assess staff skills, including their understanding of the AFHM Plan and their responsibilities to use it

() If yes, how and how often?

Verbal review during periodic training.

7c. Tenant Selection Training/Staff

(1) Has staff been trained on tenant selection in accordance with the project's occupancy policy, including any residency preferences

(2) What staff positions are/will be responsible for tenant selection?

Complex Managers. Their decision is reviewed by the Housing Manager and/or Director of Housing.

7d. Staff Instruction/Training:

Describe AFH /Fair Housing staff training, if any, provided/to be provided, to whom it was/will be provided, content of training, and dates of past and anticipated training. Include copies of any AFH /Fair Housing staff training.

At time of hire.

As needed / annual.

See attached Fair Housing Marketing Plan (Attachment 3)

See attached list of training completed (Attachment 4)

Temple Housing Authority is committed to fair housing laws, and the spirit of fair housing which include equal housing opportunity based on race, color, national origin, religion, disability or familial status. When hired, employees are trained in the areas of Fair Housing, affirmatively furthering Fair Housing and training is continued throughout the tenure of the employee. All employees are provided the opportunity to participate in Fair Housing webinars/seminars. New employees are also trained by Brenda Gurnett, Director of Housing, on Fair Housing policies and procedures.

Worksheet 1: Determining Demographic Groups Least Likely to Apply for Housing Opportunities
(See AFHM Plan, Block 3b)

In the respective columns below indicate the percentage of each demographic group for the project (if occupied), waiting list (for existing projects), census tract, housing market area, and expanded housing market area (if the latter is needed to create a more diverse housing market area in terms of race, color, national origin, religion, sex, disability, or familial status).

Wherever possible, statistics should be obtained from a local planning office, Community Development Block Grant Consolidated Plan, or another official source such as the U.S. Census Bureau (please see <http://factfinder.census.gov>. Under Decennial Census, click "Get Data". Choose SF3, then detailed tables).

If there is a significant under-representation of any demographic group in the project and/or on its waiting list relative to the surrounding housing market area, then those groups(s) that are under-represented will be considered "least likely to apply" without targeted outreach and marketing, and will be so identified in Block 3b of the AFHM Plan. See Part 3 of the Form HUD-935.2A Instructions for further guidance. **Attach maps showing both the Housing Market Area and Expanded Housing Market Area.**

Demographic Characteristics	Project %	Waiting List %	Census Tract %	Housing Market Area %	Expanded Housing Market Area% (if used)
White	72%	64%	37%	52%	46.7%
American Indian or Alaskan Native	-0-	-0-	-0-	0.5%	0.7%
Asian	1%	-0-	-0-	1.5%	2.6%
Black or African American	19%	27%	29%	16.5%	20.4%
Native Hawaiian or Other Pacific Islander	-0-	-0-	-0-	0.1%	0.5%
Hispanic or Latino	8%	9%	30%	17.8%	16.7%
Persons with Disabilities	63%	36%	47.1%	21.5%	18.8%
Families with Children	N/A	N/A	N/A	N/A	N/A
Other (specify)					
	N/A	N/A	-0-	11.6%	12.4%

Worksheet 2: Establishing a Residency Preference Area (See AFHM Plan, Block 4a)

N/A

Complete this Worksheet if you wish to continue, revise, or add a residency preference, which is a preference for admission of persons who reside or work in a specified geographic area (see 24 CFR 5.655(c)(1)(ii)). If a residency preference is utilized, the preference must be in accordance with the non-discrimination and equal opportunity requirements contained in 24 CFR 5.105(a). This Worksheet will help show how the percentage of the population in the residency preference area conforms to that of the occupancy of the project, waiting list, census tract, and housing market area. **Attach a map specifying the area for which the residency preference is requested.**

Demographic Characteristics	Project % (as determined in Worksheet 1)	Waiting List % (as determined in Worksheet 1)	Census Tract % (as determined in Worksheet 1)	Housing Market Area % (as determined in Worksheet 1)	Expanded Housing Market Area % (if needed and as determined in Worksheet 1)	Residency Preference Area % (if applicable)
White						
American Indian or Alaskan Native						
Asian						
Black or African American						
Native Hawaiian or Other Pacific Islander						
Hispanic or Latino						
Persons with Disabilities						
Families with Children						
Other (specify) <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>						

Worksheet 3: Proposed Marketing Activities – Community Contacts (See AFHM Plan, Block 4b)

For each targeted marketing population designated as least likely to apply in Block 3b, identify at least one community contact organization you will use to facilitate outreach to the group. This could be a social service agency, religious body, advocacy group, community center, etc. State the names of contact persons, their addresses and phone numbers, their previous experience working with the target population, the approximate date contact was/will be initiated, and the specific role they will play in assisting with the affirmative fair housing marketing program. Attach additional pages, if necessary.

Targeted Population(s)	Community Contact(s), including required information
Hispanic / Latino	<p>Judy Morales c/o HELP Center, P. O. Box 2071, Temple, TX 76503 (254) 770-6842</p>
	<p>The HELP Center provides a variety of assistance to low income families to include rental and utility assistance. They also make referrals to many other agencies to include Temple Housing Authority. This relationship has existed for over two decades. Judy is also involved in LULAC and serves as a City Council</p>
	<p>person. Also note that several Hispanic churches, as well as the local LULAC organization, receive our annual Fair Housing mail-out. (Attachment 5)</p>
Black or African American	<p>Bill Leak (254) 217-0298 NAACP President P. O. Box 157, Temple, TX 76503</p>
	<p>07/18/2011 Role: Make referrals</p>

Worksheet 4: Proposed Marketing Activities – Methods of Advertising (See AFHM Plan, Block 4c)

Complete the following table by identifying your targeted marketing population(s), as indicated in Block 3b, as well as the methods of advertising that will be used to market to that population. For each targeted population, state the means of advertising that you will use, as applicable to that group. In each block, in addition to specifying the media that will be used (e.g., name of newspaper, television station, website, location of bulletin board, etc.), state any language(s) in which the material will be provided, identify any alternative format(s) to be used (e.g., Braille, large print, etc.), and specify the logo(s) (as well as size) that will appear on the various materials. Attach additional pages, if necessary.

Targeted Population(s)→ Methods of Advertising ↓	Targeted Population: Hispanic or Latino	Targeted Population: Black or African American	Targeted Population:
Newspaper(s) Temple Daily Telegram	Housing ads	Housing ads	
Radio Station(s) N/A			
TV Station(s) N/A			
Electronic Media CTHC (Temple Housing Authority) web site	See Attachment 5	See Attachment 5	
Bulletin Boards Temple Housing Authority Main Office	See Attachment 6	EHO and HC logo 1" x 1" minimum	
Brochures, Notices, Flyers CTHC (Temple Housing Authority) brochure	Attachment 7 English and Spanish	Attachment 7 English	
Other (specify) Annual mail-outs	Attachment 5	Attachment 5	

All advertising will be in Spanish and English.

Note: Temple Housing Authority has a Language Assistance Plan.

Attachment 1

- a. Our HAP Contract, paragraph 1-3a, states:

Families To Be Housed. The Contract Units are to be leased by the Owner to eligible Lower-Income Families ("Families") for use and occupancy by such Families solely as private dwellings.

- b. In our Temple Housing Development Corporation Bonds Transcript of Proceedings:

Article IV, Covenants of Lessee, Section 4.01, Use of Project. The Lessee will operate the Project exclusively for Eligible Tenants and in compliance with all rules and regulations of the Government which are or which may become applicable to the Project and agrees to use its best efforts to keep all of the dwelling units occupied by Eligible Tenants so as to assure that there is no reduction in the amount of Housing Assistance Payments payable to the Lessee by the Government by reason of the lack of occupancy of the project.

Article I, Definitions and Construction. "Eligible Tenants" shall mean persons of low income, particularly elderly, handicapped or disabled persons, who qualify for housing assistance under Section 8 of the United States Housing Act of 1937, as amended.

**TEMPLE HOUSING AUTHORITY
SUBSIDIZED HOUSING
2ND QUARTER 2011**

RACIAL ANALYSIS

Race	JMH		CV		AL		RAT		FGH		WB		GH		KYLE		ALL COMPLEXES	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	Residents	Percent
White	20	25%	14	28%	35	60%	6	35%	73	74%	7	28%	72	72%	42	72%	269	56%
Black	42	55%	17	34%	11	19%	9	53%	20	20%	9	36%	19	19%	11	19%	138	28%
Hispanic	14	19%	18	36%	12	21%	2	12%	5	5%	9	36%	8	8%	4	7%	72	15%
Other	0	0%	1	2%	0	0%	0	0%	1	1%	0	0%	1	1%	1	2%	4	1%
Total	76	100%	50	100%	58	100%	17	100%	99	100%	25	100%	100	100%	58	100%	483	100%

INCOME ANALYSIS

% of Med	JMH		CV		AL		RAT		FGH		WB		GH		KYLE		ALL COMPLEXES		
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	% of Median	Residents	Percent
30	63	83%	41	82%	33	57%	10	59%	51	52%	20	80%	69	69%	42	72%	30	329	68%
50	8	10%	7	14%	18	31%	5	29%	40	40%	3	12%	27	27%	12	21%	50	120	25%
80	3	4%	2	4%	7	12%	2	12%	8	8%	2	8%	3	3%	2	3%	80	29	6%
80+	2	3%	0	0%	0	0%	0	0%	0	0%	0	0%	1	1%	2	4%	80+	5	1%
Total	76	100%	50	100%	58	100%	17	100%	99	100%	25	100%	100	100%	58	100%	Total	483	100%

CENTRAL TEXAS HOUSING CONSORTIUM FAIR HOUSING MARKETING PLAN

The Consortium's marketing goal is to eliminate barriers and provide all interested parties easy access to housing information, including families, elderly persons and others. This goal will be accomplished through distribution of housing information brochures and notices to churches, businesses, hospitals and other agencies that serve mixed populations listed in the attached Fair Housing Mail-out Agency Listing. Sample copies of an actual outreach letter and of a housing brochure are attached. Newspaper advertising may also be utilized.

Emphasis will be placed on providing minorities and persons residing in low socio-economic areas with information on how to obtain housing. The Consortium will not discriminate on the basis of race, color, creed, national origin, religion, age, sex or handicap in any phase of the occupancy process.

A. Marketing strategy includes distribution of information as follows:

1. Annual mailing of housing information brochure to:
 - a. Social Service Organizations.
 - b. Hospitals.
 - c. Chamber of Commerce of City of Temple and City of Belton.
 - d. Central Texas Council of Governments.
 - e. Laundries, Grocery Stores, and Discount Stores.
2. Daily display of housing information brochures at the Consortium office.
3. Advertise regularly in local newspaper and include Fair Housing Logo and statement "Equal Opportunity Housing" in newspaper advertisements.

B. Direction of Marketing Activity

HUD Directive Number: 8025.1, Chapter 2, Section 2-8, Direction of Marketing Activity states, "If the applicant believes that no single group will need special outreach, the applicant shall indicate in the Plan and explain the reasons for such determination."

Census statistics for Temple and Belton indicate that minority representation in the Central Texas Housing Consortium's complexes is close to percentages of minorities as a percentage of Temple and Belton's total population. This indicates minorities are as likely to apply as non-minorities so the direction of marketing activities is general. Should minority statistics decline, marketing will be directed to appropriate populations.

C. Experience and Staff Instructions

All Central Texas Housing Consortium (CTHC) management employees have read this Plan and are knowledgeable about Fair Housing Laws. The Director of Housing periodically attends Fair Housing training seminars and updates and trains other housing staff on this subject. Consortium employees have been instructed through the written Occupancy Policy on the requirement to follow Fair Housing Laws in the management of all CTHC properties. (See excerpt below)

Excerpt from Central Texas Housing Consortium Occupancy Policy

FAIR HOUSING

It is the policy of the Consortium to fully comply with all Federal, State and local nondiscrimination laws; the Americans with Disabilities Act; and the U. S. Department of Housing and Urban Development regulations governing Fair Housing and Equal Opportunity.

No person shall, on the grounds of race, color, sex, religion, national or ethnic origin, familial status, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the Consortium's programs.

The Consortium will assist any family that believes they have suffered illegal discrimination by providing them copies of the appropriate housing discrimination forms and assisting them in completing the forms if requested. In addition, all advertisements will contain the appropriate Equal Opportunity language and logo.

MARKETING

The Consortium will publicize the availability and nature of its housing programs for extremely low-income, very low and low-income families throughout the Consortium's jurisdiction. Efforts to inform community leaders, social service agencies, and other interested parties will be made through both formal and informal meetings and by other suitable means.

List of Training Completed by Temple Housing Authority Staff

<u>Housing Staff</u>	<u>Training Completed</u>	<u>Provided By</u>	<u>Date</u>
Brenda Gurnett Director of Housing	Serving Rental Housing Needs	Apartment Association of Central Texas	April 20, 2011
Brenda Gurnett Director of Housing	Fair Housing & Reasonable Accommodation	Nan McKay & Associates, Inc.	February 27, 2008
Brenda Gurnett Director of Housing	Fair Housing Issues for Management	Nan McKay & Associates, Inc.	July 27, 2007
Brenda Gurnett Director of Housing	Fair Housing for Management	Apartment Association of Central Texas	July 18, 2006
Linda Jaske Housing Manager	Fair Housing Issues for Management	Nan McKay & Associates, Inc.	July 27, 2007