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Important Notice
Affirmative Fair Housing Marketing Plan (AFHMP)
Line by Line Instructions¹

The Missouri Housing Development Commission (MHDC) is offering line by line instruction for HUD Form 935.2A Affirmative Fair Housing Marketing Plan (AFHMP). This form must be **reviewed** every five years or when the local Community Development jurisdictions Consolidated Plan is updated. Based on the owner review, a determination should be made if a new plan would need to be submitted. If based on the owner, review it's determined the AFMHP does not need to be updated, the owner must maintain a file documenting what was reviewed, what was found as a result of the review, and why no change was required. MHDC or HUD may review this documentation during a monitoring review.

The AFHMP form must be **updated**: 1) every fifth year after the date of initial completion if owner review determines a new plan must be submitted; 2) when there is a management company change; 3) when the local community development jurisdiction's Consolidated Plan is updated if owner review determines a new plan must be submitted; 4) when substantial changes occur within the plan; or 5) when otherwise required or requested by MHDC or HUD.

The Affirmative Fair Housing Marketing requirements require that each applicant subject to these regulations carry out an affirmative program to attract prospective buyers or tenants of all minority and non-minority groups in the housing market area regardless of race, color, religion, sex, national origin, disability, or family status. These groups include Whites (Non-Hispanic), Blacks (Non-Hispanic); American Indians/Alaskan Natives, Hispanics, Asian/Pacific Islanders, and Hasidic Jews in the Standard Metropolitan Area (SMA) or the market area who may be subject to housing discrimination on the basis of race, color, religion, sex, disability, family status, or national origin.

Please see the matrix below regarding to whom the AFHMP should be sent:

Funding Type	AFHMP Approval by	Comments
Risk share/Fund Balance	MHDC	
HOME	MHDC	
Tax Credit	MHDC	
Participation Loans where MHDC is the servicer	MHDC	i.e. Fannie Mae, US Bank
HAP only	HUD	
HAP/TC	HUD	Property should send to MHDC and HUD
HAP/Risk share/Fund Balance	HUD	Property should send to MHDC and HUD

¹ The instructions provided supplement but do not take the place of the Form 935.2A AFHMP instructions.



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The mailing address for MHDC is below:

Missouri Housing Development Commission
 Attn: Compliance Support
 505 N. 7th Street, 20th Floor, Suite 2000
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**Affirmative Fair Housing Marketing Plan (AFHMP)
 Line by Line Instructions**

Part 1		
	Block 1a-Project Name and Address	Provide the property name and address. Please include the county as this frequently omitted.
	Block 1b-Project Contract Number	Provide the property's Section 8/PRAC number. If there is not subsidy contract, provide the FHA number.
	Block 1c-Number of Units	Provide the total number of units in the property.
	Block 1d-Census Tract	Provide the census tract number. This information may be obtained from local planning office, Community Development Block Grant Consolidated Plan or http://factfinder2.census.gov.main.html
	Block 1e-Housing/Expanded Housing Market Area	<p>Provide housing market area (town/city/county) from which the owner/agent intends to draw applicants. A housing market area is the area from which a multifamily housing project owner/agent may reasonably expect to draw a substantial number of its tenants. The U.S. Census Bureau provides a range of levels from which to draw.</p> <p>If the immediate housing market area is not demographically diverse enough to draw applicants considered least likely to apply for housing in this project (those "least likely to apply" are those populations currently underrepresented in the project or underrepresented on the waiting list), an "Expanded Housing Market area" should be listed to increase the diversity of individuals to be reached by its marketing efforts. An expanded housing market area is a larger</p>



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		geographic area, such as a Metropolitan Division or a Metropolitan Statistical Area, which may provide additional diversity in terms of race, color, national origin religion, sex, familial status, or disability.
Part 1 continued	Block 1f-Managing Agent Information	Provide the management agent's name, address, telephone number & email address. Please include the telephone number and email address as these items are frequently omitted. This block should only be completed if a Managing Agent (the agent cannot be the applicant) is implementing the AFHMP.
	Blocks 1g-Application/Owner/Developer	Provide owner's name, address, telephone number & email address. Please include the county, telephone number and email address as these items are frequently omitted.
	Blocks 1h-Entity Responsible for Marketing	Check the entity responsible for marketing (owner, agent, or other). Also provide the position, name, address, telephone and email of the person responsible for implementing marketing plan. Please include the telephone number and email address as these items are frequently omitted.
	Blocks 1i-Approval Correspondence Contact	Provide a contact person to whom all correspondence (including approval of this plan) should be sent. Please include the telephone number and email address as these items are frequently omitted.
Part 2		
	Block 2a-Type of AFHMP	Indicate the status of the AFHMP as initial or updated. Provide the date of the first approved AFHMP. If this is an initial AFHMP, provide the date it will be sent for approval. Provide a reason for the update (i.e. five year review or changes due to local demographics or other conditions). Also see instructions for Part 9.
	Block 2b-HUD Approved Occupancy of Project	Indicate all groups approved for occupancy in the property in accordance with the contract, grant or funding type.
	Block 2c-Date of Initial Occupancy	Provide the date the project will be/was first occupied.
	Block 2d-Advertising Start Date	List the advertising start date. This date should be at least 90 days prior to initial occupancy for new projects. For existing projects , the date could be on-going; If applicable, please provide dates that



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		<p>advertising will be used to fill existing vacancies, “add” applicants to the waitlist or “reopen” the waiting list. Please add the number of persons currently on the waitlist when advertising begins.</p>
<p>Part 3</p>		
	<p>Block 3a-Demographics of Project and Housing Market Area</p>	<p><u>Enter the requested data into Worksheet 1</u> Determining Demographic Groups Least Likely to Apply for Housing Opportunities</p> <ul style="list-style-type: none"> • Project %: List % of individuals from each demographic category that reside in the project. • Applicant Waiting list %: List % of individuals from each demographic category that are on the project’s waiting list. • Census Tract %: List % of individuals from each demographic category that reside in the project’s census tract. <p>To obtain the most meaningful information, use demographic data for those who would be eligible for housing in your designated area. For example, if you facility is for seniors, then census information should be limited to seniors in your area. Subsets of demographic information can be obtain by various categories, e.g., age, income, etc. Information can be obtained from the U.S. Census website, under American Fact Finder where you can custom design the information that will be helpful for your purpose. If you need help finding your selected information from the U.S. Census website, they have a very useful customer service helpline, 1-800-923-8282.</p> <ul style="list-style-type: none"> • Housing Market Area %: List % of individuals from each demographic category that reside in the project’s housing market area (area from which most applicants are drawn). Demographic data on this area should be obtained by reviewing the census data or by contacting town/city/county official offices. • Expanded Housing Market Area % (if applicable): List % of individuals from each demographic category that reside in the project’s Expanded Housing Market



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Part 3 continued		<p>Area (larger region from which applicants can be drawn). Attach maps showing both the housing area and the expanded housing area.</p> <p>Please note: Expanded Housing Market Areas should be utilized if the smaller housing market area is not diverse enough to attract demographic groups underrepresented as tenants at the project/underrepresented on the waiting list. If the current occupancy AND waiting list AND Housing Market Area are not demographically diverse, applicants MUST utilize the Expanded Housing Market Area. Omitting this data will result in the plan being returned as incomplete.</p>
	Block 3b-Targeted Marketing Activity	<p><u>Use the information from completed Worksheet 1</u></p> <p>Identify the demographic groups least likely to apply for your property without special outreach efforts including marketing materials in other languages for limited English proficient individuals, and alternative formats for persons with disabilities. Reasons for not applying may include insufficient information about housing opportunities, language barriers, or transportation impediments.</p> <p>This determination can be made by comparing the Project/Waiting list % against the Census/Housing Market Area %. Is each group in the community appropriately represented in the project or on the waiting list? If so, that particular group does not need extra outreach. However, if the Project/Waiting List % is less than the % in the general community, that particular group does need additional outreach and should be checked off on #3b.</p>
Part 4		
	Block 4a-Residency Preference	<p><u>Enter the requested data into Worksheet 2</u> Establishing a Residency Preference</p> <p>Complete this worksheet to continue, revise, or add a residency preference, which is a preference for</p>



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<p>Part 4 continued</p>		<p>admission of a person who resides or works in a specified geographic area (see 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 compares to the demographics of the property's residents, applicant data, census tract, housing market area and expanded housing market area. Please attach a map clearly delineating the residency preference geographic area.</p>
	<p>Block 4b-Proposed Marketing Activities: Community Contacts</p>	<p><u>Enter the requested data into Worksheet 3</u></p> <p>List a SPECIFIC community contact for EACH group identified in #3b as needing extra outreach. Please note: If generic phrases such as "All/Mixed" are used under "target population, the AFHMP will be returned as incomplete.</p> <ul style="list-style-type: none"> • Targeted Population: List EACH group listed under #3b as needing extra outreach to apply for housing. • Community Contacts: List specific community contacts for EACH group listed under #3b. Please Note: Generic community contacts (Housing Authorities, Dept. of Social Services etc.) are generally NOT an acceptable community contact; government agencies are generally NOT an acceptable community contact. However, they can be used in addition to listing acceptable community contacts. <p>This table should include the agency, name of a contact person and position, the address, phone, email, previous experience working with the target population(s), how they have agreed to help assist in informing the target population about the property's housing availability and the approximate date contact was/will be initiated.</p>



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Part 4 continued	Block 4c- Proposed Marketing Activities: Methods of Advertising	<p>Enter the requested data into Worksheet 4 Proposed Marketing Activities-Methods of Advertising</p> <p>Describe your proposed method(s) of advertising to market to those least likely to apply. This table should identify each media option, percentage of the readers/ listeners/users/ members/etc. who are members of the targeted population(s), language(s) into which the material (s) will be translated, alternative format(s) that will be used to reach persons with disabilities, and logo(s) that will appear on the various materials (as well as their size).</p> <p>Please attach a copy of advertising or marketing material.</p>
Part 5		
	Block 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)). The agent/owner must check the box indicating all locations where the Fair Housing Poster will be displayed.
	Block 5b-AFHMP	The AFHMP must be available for public inspection at the sales or rental office (24 CFR 200.625). The agent/owner must check the box indicating all locations where the AFHMP will be available.
	Block 5c-Project Site Sign	<p>The project site sign should display in a conspicuous position the HUD approved Equal Housing Opportunity logo or slogan or statement (24 CFR 200.620(f)). The agent/owner must check the box indicating where the project site sign will be displayed, as well as the size of the sign and the size of the logo, slogan or statement.</p> <p>Please submit photographs of the project site signs.</p>
Part 6		
	Block 6-Evaluation of Marketing Activities	Explain the evaluation process to be used to determine if you have been successful in attracting the groups identified as least likely to apply. You must explain how often you will evaluate the effectiveness of your



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		marketing efforts and how you will make decisions about future marketing activities based on your evaluation. If determined the plan is not successful, describe steps that will be taken to modify the plan.
Part 7		
	Block 7a-Marketing Staff	List the name and position of staff that will be responsible for marketing efforts.
	Block 7b-Staff Training and Assessment: AFHMP	Indicate whether staff has been trained on the use of the AFHMP and specify whether there is ongoing training on the AFHMP and Fair Housing Act issues in general. <u>Show who provides the training and how frequently.</u> In addition, specify whether you periodically assess staff members' skills in relation to the AFHMP and staff responsibilities to use the plan. State how often you assess employee skills and how you conduct the assessment.
	Block 7c-Tenant Selection Training/Staff	Indicate whether staff has been trained on tenant selection in accordance with the property's occupancy policy, including residency preferences (if any). Identify those staff positions that are/will be responsible for tenant selection.
	Block 7d-Staff Instruction/Training	
		Include copies of any written AFHMP/Fair Housing Act training materials related to staff training, to whom it was/will be provided, content of training and identify the dates of past and anticipated training.
Part 8		
	Block 8-Additional Considerations	List any additional considerations and efforts not previously mentioned that were/are planned to attract individuals lease likely to apply for the subject housing that should be noted regarding the property's marketing activities.
Part 9		
	Block 9-Review and Update	Sign and date the AFHMP. By signing, the owner/agent assumes responsibility for implementing the AFHMP. <u>Owner/Agents must review their AFHMP every five years or when the local</u>



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<p>Part 9 continued</p>		<p><u>Community Development jurisdiction’s Consolidated Plan is updated, or when there are significant changes in the demographics of the project or the local housing market area.</u></p> <p>When reviewing the plan, the owner/agent should consider the current demographics of the housing market area to determine if there have been demographic changes in the population in terms of race, color, national origin, religion, sex, familial status or disability. The owner/agent will then determine if the population least likely to apply for the housing is still the population identified in the AFHMP, whether the advertising and publicity cited in the current AFHMP are still appropriate, or whether advertising sources should be modified or expanded.</p> <p>Even if the demographics of the housing market area have not changed, the owner/agent should determine if the outreach currently being performed is reaching those it is intended to reach as measured by project occupancy and applicant data. If not, the AFHMP should be updated. The Revised AFHMP must be submitted to MHDC and/or HUD (as specified by the particular affordable housing program) for approval.</p> <p>If based on their review owner/agents determine the AFHMP does not need to be revised, they should maintain a file documenting what was reviewed, what was found as a result of the review, and why no changes were required.</p>
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