

City of Hartford
Department of Development Services
Housing and Property Management Division

HOME INVESTMENT PARTNERSHIPS (HOME) PROGRAM
AFFIRMATIVE MARKETING POLICY AND PROCEDURES

STATEMENT OF POLICY:

In accordance with the Regulations of the HOME Investment Partnerships (HOME) Program as defined in 24 CFR Part 92 Final Rule Dated September 16, 1996 Subpart 92.351, and in furtherance of the City of Hartford commitment to non-discrimination and equal opportunity in housing, the City of Hartford establishes procedures to affirmatively market units created under the HOME Program. This policy applies to rental and homeownership development projects containing five (5) or more HOME-assisted units funded through the City of Hartford's HOME Program. (The affirmative marketing procedures do not apply to families with Section 8 Housing Choice Voucher rental housing assistance.) The procedures are intended to further the objectives of Title VIII of the Civil Rights Act of 1968, Executive Order 11063.

The City of Hartford believes that individuals of similar economic levels in the same housing market area should have available to them a like range of housing choices regardless of their race, color, religion, gender, sexual orientation, national origin, familial status or disability.

Property owners/developers selected for participation in the HOME Program must comply with the City of Hartford's HOME Affirmative Marketing Policy requirements for a period of five years. These requirements are included in the HOME Loan/Grant Agreement and are in the form of deed restrictions. Failure to carry out the Agreement could make an owner ineligible to participate in the HOME Program with future projects.

The City of Hartford is committed to the goals of affirmative marketing which will be implemented as part of the HOME Program through a specific set of steps that the City and participating owners/developers will follow. These goals will be reached through the following procedures:

1. Informing the public, potential tenants, and owners about Federal fair housing laws and affirmative marketing policy.

Through its Department of Development Services Housing and Property Management Division, the City of Hartford will inform the public, potential tenants, and property owners about this policy and Federal fair housing laws. The Housing and Property Management Division will:

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- Inform the general public about Federal fair housing laws and the City of Hartford's HOME Affirmative Marketing Policy by placing information on the City's Website within the Department of Development Services Housing and Property Management Webpage that describes the HOME Program.
- Provide every HOME Program applicant with a copy of its Affirmative Marketing Policy and Procedures.
- Make copies of the HOME Affirmative Marketing Policy and Procedure document available at the City's Housing and Property Management Division office.

2. Requirement for owners to inform the general renter public about available rehabilitated or newly constructed units.

It is the City of Hartford's policy to require substantial steps by HOME project owners/developers to carry out affirmative marketing. Owners/developers should provide for costs associated with these requirements in their planned operating costs.

If it is feasible to advertise in advance of selecting a tenant, without holding units off the market, property owners will be required to make information on the availability of units known through:

- Advertisements in the *Hartford Courant*, if the owner ordinarily advertises available rentals in news media.
- Notifying the Hartford Housing Authority and Imagineers, LLC requesting that staff inform applicants on their Section 8 Housing Choice Voucher Certificate waiting list about upcoming vacancies. (Imagineers, LLC, a housing services organization, located on Farmington Avenue in Hartford manages the City's Section 8 program.)

3. Special Outreach

In order to inform as well as solicit applications from persons in the housing market area who are not likely to apply for units without special outreach, the City of Hartford has established methods property owners must use in order to reach this objective.

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The City of Hartford has identified three segments of its housing population who would probably not apply for units without special outreach. One segment of its population concerns African American residents who ordinarily would not apply for units in the South Green neighborhood, the Behind the Rocks neighborhood, and in the Frog Hollow neighborhood (Frog Hollow is identified within the City's Consolidated Plan as a Neighborhood Revitalization Strategy Area (NRSA)). The other two segments of the population are White and Hispanic residents who would probably be less likely to apply for units in the Northeast (also designated as a NRSA), Clay Hill Arsenal, Blue Hills and Upper Albany neighborhoods.

Having identified these three segments of our population, we require that owners/developers use special outreach methods as follows:

For housing developments in the South Green, Behind the Rocks, and Frog Hollow neighborhoods:

- Owners who ordinarily advertise rental property must place advertisement in the *Northend Agent* or the *Hartford Inquirer* - newspapers whose circulation are primarily among African American residents of the community.
- Owners who do not ordinarily advertise in the news media must contact the following organization in Hartford that has agreed to make rental information available to members and clients:

Urban League of Greater Hartford, Inc.
140 Woodland Street
Hartford, CT 06105
Telephone: 527-0147
www.ulgh.org

For housing developments in the Northeast, Clay Hill Arsenal, Blue Hills and Upper Albany neighborhoods:

- Owners who ordinarily advertise rental property must place advertisement in the *Hartford News* - a newspaper whose circulation is primarily among White and Hispanic residents of the community.

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- Owners who do not ordinarily advertise in the news media must contact the following organization in Hartford that has agreed to make rental information available to members and clients:

Hartford Areas Rally Together (HART)
385 Washington Street
Hartford, CT 06106
Telephone: 525-3449
<http://hartofhartford.org/>

4. Recordkeeping

The City of Hartford will require that owners keep records on:

1. The racial/ethnic and gender characteristics of tenants and applicants during the initial post construction lease up period and for all vacancies thereafter for a period of five (5) years.
2. Activities they undertake to inform the general renter public, specifically:
 - copies of advertisements placed in the *Hartford Courant*
 - copies of letters/notices/emails to the Hartford Housing Authority and Imagineers, LLC
3. Activities they undertake for special outreach, specifically:
 - copies of advertisements placed in the *Northend Agent*, *Hartford Inquirer* or *Hartford News*
 - copies of letters/notices/emails to the Urban League and HART

5. Performance Assessment

The affirmative marketing efforts of property owners will be assessed by the Housing and Property Management Division as follows:

To determine if good faith efforts have been made on part of the owner:

- Examine affirmative marketing records that owners are required to maintain in accordance with this policy.

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To determine results:

- Assess property owner's affirmative marketing efforts in relation to whether or not persons from the variety of racial and ethnic groups in our area and in particular African Americans, Whites and Hispanics have in fact applied for and/or become tenants in the rehabilitated/newly constructed units.

If the representation of racial/ethnic groups is not broad or the identified groups are not represented, the City will review the affirmative marketing procedures to determine what changes, if any, might be made to make the affirmative marketing efforts more effective in informing persons in all groups about rental opportunities.

The Housing and Property Management Division will also ask property owners for their analysis and suggestions concerning our affirmative marketing policy and procedure requirements.

6. Corrective Action

The City of Hartford will take corrective action if we find that an owner fails to carry out the required procedures or fails to maintain the records on tenants and applicants in accordance with this policy.

If problems are identified, the City will discuss ways to improve owner's efforts prior to taking corrective actions.

As an initial step, the City may require owners with vacancies to notify the City of Hartford's Housing and Property Management Division immediately upon learning that a unit will become vacant. Owners will be asked to provide this information as close to 30 days prior to the upcoming vacancy as possible. The Housing and Property Management Division staff will then be able to verify on a "spot check" basis if these owners are following the prescribed procedures.

The City will carry out its assessment activities, and prepare a written assessment of affirmative marketing efforts in time to submit an Annual Performance report to HUD.