

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, as amended, 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, including housing that is subsidized with tenant-based or project-based rental assistance. The procedures are intended to further the objectives of the Federal Fair Housing Act or Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and the U.S. Department of Housing and Urban Development's (HUD) final rule entitled Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity dated March 5, 2012.

Housing funded by the City of Hartford's HOME Program shall not involve discrimination against any individual or family otherwise eligible for HUD-assisted housing, including housing acquired, rented or rehabilitated with HOME funds. Property owners and property managers of HOME funded properties must make housing available without regard to race, color, religion, sex, age, actual or perceived sexual orientation, gender identity, marital status, national origin, disability and familial status. Property owners and property managers of HUD-assisted housing are prohibited from inquiring into an applicant or occupant's sexual orientation and gender identity for the purpose of determining eligibility or otherwise making housing available.

Family includes, but is not limited to regardless of marital status, actual or perceived sexual orientation, or gender identity, the following: (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or (2) A group of persons residing together, and such group includes, but is not limited to: (a) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family); (b) An elderly family; (c) A near-elderly family; (d) A disabled family; (e) A displaced family; and (f) The remaining member of a tenant family. *Gender identity* means actual or perceived gender-related characteristics. *Sexual orientation* means homosexuality, heterosexuality, or bisexuality.

Property owners/developers selected for participation in the HOME Program must comply with the City of Hartford's HOME Affirmative Marketing Policy and Procedure requirements throughout the HOME Affordability Period when developing rental projects and for the period of the initial property conveyance for homebuyer projects. The "Affordability Period" is five years when the amount of HOME funds invested per HOME-Assisted unit is less than \$15,000; ten years when the amount is between \$15,000 and \$40,000; fifteen years when the amount is greater than \$15,000; or twenty years if the development project included new construction of rental housing. These requirements are included in the HOME Loan/Grant Agreement in the

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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 homebuyers, and property developers/owners about this policy and Federal fair housing laws. The Housing and Property Management Division will:

- 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 developers/owners to inform the general renter/potential homebuyer 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 development budgets and/or operating budgets.

Developers/owners must include the Equal Housing Opportunity logo, or slogan ("Equal Housing Opportunity"), in all marketing/advertising materials and/or notices posted and/or sent to community organizations.

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

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- * Advertisements in the *Hartford Courant* newspaper, if the owner ordinarily advertises available rentals/homeownership units in news media. (In addition to hard copy newspaper advertisements, owners may choose to use the Internet by advertising in the *rent.com* website for available rental units and by advertising in the *realtor.com* website for available homeownership units. However, the use of Internet advertising shall not replace the use of advertising in the *Hartford Courant* newspaper.)
- * 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 rental 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 developers/owners must use in order to reach this objective. 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. 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, 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/homeownership units 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/homeownership unit information available to members and clients:

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

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

- Owners who ordinarily advertise rental property/homeownership units must place advertisement in the *Hartford News* - a newspaper whose circulation is primarily among White and Hispanic 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/homeownership unit 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 sex, race and ethnicity of tenants and applicants during the initial post construction lease up period and for all rental vacancies thereafter throughout the HOME Affordability Period.
2. The sex, race and ethnicity of homebuyers and applicants during the construction period and thereafter until all homebuyer units are sold.
3. Activities they undertake to inform the general public, specifically:
 - * copies of advertisements placed in the *Hartford Courant*
 - * copies of letters/notices/emails to the Hartford Housing Authority and Imagineers, LLC
4. 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 or HART

5. Performance Assessment

The affirmative marketing efforts of property developers/owners will be assessed annually by the City of Hartford as follows:

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- * To determine if good faith efforts have been made on part of the owner, the City will examine affirmative marketing records that owners are required to maintain in accordance with this policy.
- * To determine results, the City will 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/homeowners 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 and homeownership opportunities.

The Housing and Property Management Division will also ask property developers/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/homeowners 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 rental 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 to submit an Annual Performance report to HUD.