

## City of Gresham Affirmative Marketing Plan

### Introduction

To further the City of Gresham's ("City") commitment to nondiscrimination and equal opportunity in housing, and in accordance with the regulations of the HOME Investment Partnerships Program (HOME), the City of Gresham Community Revitalization division has established the following procedures to affirmatively market HOME-assisted housing units.

The policies and procedures outlined in this City of Gresham Affirmative Marketing Plan ("Plan") will be applied to all City-run, HOME funded activities and the City will require subrecipients receiving HOME funds for Tenant Based Rent Assistance (TBRA) and homebuyer activities with fewer than 5 units to adopt the City's plan or submit their own plan that meets the requirements of 24 CFR 92.351. Projects for rental housing and homebuyer activities with five or more units will be required to submit HUD form 935.2A detailing their own Affirmative Marketing Plan specific to their project that meets the requirements of 24 CFR 92.351.

The purpose of this Plan is to ensure that City-run programs, contractors and subrecipients receiving HOME funds, and project owners promote fair housing and actively work to engage communities that are the least likely to apply for assistance.

### Public Availability & Promotion of the Plan & Fair Housing Laws

The City of Gresham promotes Federal fair housing laws and the Plan through a series of activities annually and requires that subrecipients and project owners receiving HOME funds follow specific practices to ensure the public availability of the plan.

### City Requirements & Practices

- The Plan will be posted to the City's Community Revitalization website under the "Program Documents" section of the page. This page is available to the public and will be updated whenever adjustments to the Plan are made.
- The City will include the fair housing logo on all program documents and public notices related to HOME funding or activities using HOME funding.
- All contracts and subrecipient agreements with HOME funds will include a copy of the Plan or a copy of the subrecipient's plan as an Exhibit.
- A copy of the Plan will be attached as a supplemental document available for all HOME applicants to review during the application process annually. The requirement to have written affirmative marketing procedures will be noted annually at the City's application workshop.
- The City will make copies of the Plan available to attendees at public meetings or available upon request via email or USPS to members of the public.
- The City engages with the Fair Housing Council of Oregon to participate in fair housing activities and the promotion of Federal and local fair housing laws annually.

### Requirements & Practices for Subrecipients & Project Owners

- Fair Housing logo must be present on all marketing or advertising materials for the HOME funded project.

- The fair housing poster must be displayed in the organization’s lobby or office if potential tenants or homebuyers will visit those facilities.
- Marketing materials used to promote HOME funded projects must include information about accommodations and how the program is accessible for persons with disabilities.
- The Affirmative Marketing Plan must be made available upon request to all potential clients or homebuyers.
- The subrecipient or project owner must maintain a nondiscriminatory hiring policy.
- Programmatic staff carrying out the program must be trained in program policies and Federal fair housing laws.

### **Procedures to Solicit Applications**

The City, its subrecipients and HOME-funded project owners must make good faith efforts to solicit applications from those least likely to apply. Marketing and outreach efforts shall be structured to attract homebuyers and tenants City-wide regardless of gender, disability, familial status or ethnicity. To ensure that marginalized groups can access HOME-funded programs marketing efforts shall be carried out as follows.

- Gresham HOME funded activities are to be marketed City-wide to Gresham households and individuals.
- The City, its subrecipients and project owners will partner with culturally specific organizations, schools and/or other community groups that work with marginalized communities to accept referrals or promote programs.
- Marketing materials and outreach efforts shall be provided in English and Spanish and made available in additional languages upon request.
- Marketing materials shall include information about accommodations, translation requests and how the program is accessible for persons with disabilities.
- If applicable, outreach events planned to promote the program will be accessible to persons with disabilities, translation and other accommodations must be provided upon reasonable request and events should be located in spaces that are easily accessible by public transportation whenever possible. When possible, events should be held in community spaces that marginalized groups are already familiar with such as churches, schools, community centers or other spaces where low-income individuals may already be accessing other services.

### **Recordkeeping**

- Records shall be maintained by the City, subrecipient or project owner depending on who runs the program. For City-run programs, the City will maintain all files. For subrecipient or project owner led programs, the subrecipient or project owner will maintain client-specific files and documentation that affirmative marketing procedures have been followed.
- Client files must include:
  - General Client Information: Client name, household size, annual income, ethnicity, ages of all members of the household
  - Documentation of household income
  - Documentation of any accommodations necessary for any members of the household

- If applicable, documentation of which organization(s) referred the client to the program
- Other documents as specified by the program
- Copies of marketing materials including any translated versions shall be maintained in a project file.
- Descriptions of outreach events, event promotional materials and documentation of any translation or accommodations requested and provided shall be maintained in a project file.

### **Evaluation**

Annually, each HOME funded activity will be reviewed to evaluate the demographics of clients served under the program.

- What does the ethnic make-up of clients served look like compared to the overall demographics of the City? Are diverse groups regularly accessing the program?
- Has the program served families with children? If not, why?
- Is the activity assisting individuals who have limited English proficiency?
- Is the program assisting persons with disabilities?
- Are there other marginalized, at-risk groups in the community that are not being served by this program?
- How can Affirmative Marketing efforts be adjusted to address any service gaps for specific communities identified above?